

*Sacerdote, et al. v. New York University*, 1:16-cv-06284 (KBF) (S.D.N.Y.)

## **Joint Pre-Trial Order- Exhibit 6**

**April 5, 2018**

### **Plaintiffs' Trial Exhibit List**

2018-04-05 Plaintiffs' Exhibit List.xlsx

Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0001	CLC0000142	CLC0000174	1/1/2002	Nancy Sanchez / Patricia Halley Depo		NYU School of Medicine Retirement Plan for Members of the Faculty, Professional Research Staff and Administration including Amdts 1-4			
PX0002	CLC0000285	CLC0000318	5/1/2008			Cammack DC Retirement Plan Investment Consulting Services Proposal			
PX0003	CLC0000319	CLC0000329	4/16/2008			RFP for Inv Cons w notes			
PX0004	CLC0000330	CLC0000375	6/4/2008			Cammack DC Plan Consulting Services			
PX0005	CLC0000425	CLC0000427	3/17/2017			Letter from TIAA to NYU re: TIAA as recordkeeper for Plans			
PX0006	CLC0000428	CLC0000513	11/16/2016			TIAA RFP Response			
PX0007	CLC0000649	CLC0000653	2/23/2017			Cammack RFP Follow up Analysis			
PX0008	CLC0000738	CLC0000754	1/1/2016			RK RFP Analysis Details Draft			
PX0009	CLC0000755	CLC0000769	2/1/2017			Cammack RFP Executive Analysis			
PX0010	CLC0001049	CLC0001056	6/27/2008	Jan Rezler Depo		NYU_Response To Post Finalist Presentation Questions			
PX0011	CLC0001065	CLC0001070	10/1/2008			Letter from Cammack to client re: Service Agreement			
PX0012	CLC0001072	CLC0001167	5/7/2008			CLC Response to IC Services Proposal			
PX0013	CLC0001276	CLC0001348	6/4/2008			NYU Defined Contribution Retirement Plan Investment Consulting Services			
PX0014	CLC0001439	CLC0001502	6/4/2008			Cammack Due Diligence Example			
PX0015	CLC0001835	CLC0001835	6/4/2010			NYU Vendor Fee Confirmation			
PX0016	CLC0001836	CLC0001836	9/24/2012			Ltr to Meagher from Cammack Paula Kennedy re Adding Vanguard Funds to Hospitals lineup to replicate School of Medicine Plans			
PX0017	CLC0001963	CLC0001972	9/23/2010			Fund Analysis			
PX0018	CLC0004823	CLC0004825	4/9/2009			NYU Langone TIAA Data Request Response Document	Incomplete per FRE 106. This document purports to attachment materials that have been excluded from the exhibit.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575- 76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0019	NYU0000334	NYU0000348	2/21/2008	Nancy Sanchez Depo		Custodial Account Agreement for a 403(b) Plan Amend No. 1 - Custodial			
PX0019	NYU0000408	NYU0000409	9/9/2008			Account Agreement between 403(b) and JP Morgan Chase Bank			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0019	CLC0004836	CLC0004837	4/1/2018			Amendment No. 2 to the Custodial Account Agreement for a 403(b) Plan (use this one for main agreement)		The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0020	CLC0005002	CLC0005005	3/16/2009			NYU Langone_Vanguard RFI Response	Incomplete per FRE 106. This document references attachment materials to separate e-mail that have been excluded from the exhibit.		
PX0021	CLC0005101	CLC0005114	8/28/2008			NYU_Vanguard QDIA Selection and Adm Signatories		The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0022	CLC0005115	CLC0005119	3/19/2009			NYU Langone_Vanguard RFI Response	Incomplete per FRE 106. This document references attachment materials to separate e-mail that have been excluded from the exhibit.		
PX0023	CLC0005240	CLC0005269	3/31/2009			NYU TIAA Monitoring Report			
PX0024	CLC0005557	CLC0005601	4/2/2009			NYU Vanguard Monitoring Report			
PX0025	CLC0005826	CLC0005826	4/8/2009			NYU Langone - SOM Vanguard Monitoring Report			
PX0026	CLC0006118	CLC0006162	4/8/2009			NYU WS Vanguard Monitoring Report			
PX0027	CLC0006178	CLC0006178	5/15/2009			NYU and NYU Langone Combined Assets and Expenses			
PX0028	CLC0006829	CLC0006849	5/5/2009			NYU SOM TIAA Monitoring Report			
PX0029	CLC0006850	CLC0006856		(164-064)	Ex. 055	NYU _ TIAA_Langone SD			
PX0030	CLC0006967	CLC0006998	5/5/2009			NYU WS TIAA Monitoring Report			
PX0031	CLC0007064	CLC0007108	5/6/2009			NYU SOM Vanguard Monitoring Report			
PX0032	CLC0007228	CLC0007276	5/7/2009			NYU WS Vanguard Monitoring Report			
PX0033	CLC0007285	CLC0007294	1/22/2010			TIAA Stable Value Product Suite			
PX0034	CLC0007983	CLC0008132	3/31/2010	Daniel Fischel Depo	Exhibit 3	Cammack NYU Fiduciary Due Diligence Report			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0035	CLC0008500	CLC0008502	4/23/2010			VanguardEmail.com			
PX0036	CLC0010158	CLC0010380	9/30/2010			Cammack Fiduciary Due Diligence Report			
PX0037	CLC0011438	CLC0011438	12/31/2010			NYU Participant Usage by Vendor			
PX0038	CLC0011439	CLC0011440	12/31/2010			NYU Participant Usage by Vendor			
PX0039	CLC0012977	CLC0012982	6/30/2011	Jan Rezler Depo		Cammack NYU Fiduciary Responsibility and Process Review			
PX0040	CLC0013700	CLC0013703	2/21/2012			NYU Retirement Committee Meeting Minutes			
PX0041	CLC0013709	CLC0013719	4/16/2008			RFP Clean Copy			
PX0042	CLC0014290	CLC0014290	5/10/2012			Board Update Topics 2011-2012 - NYU Retirement Committee			
PX0043	CLC0014370	CLC0014491	3/31/2012			NYU and NYU LMC Fiduciary Due Diligence Report			
PX0044	CLC0014503	CLC0014635	6/30/2012			NYU and NYU LMC Fiduciary Due Diligence Report			
PX0045	CLC0014761	CLC0014891	9/4/2012			NYU Retirement Committee Meeting Materials			
PX0046	CLC0015757	CLC0015757	6/30/2013			Clients			
PX0047	CLC0016219	CLC0016300	12/31/2013	(164-136)	Ex. 127	Cammack Fiduciary Due Diligence Report			
PX0048	CLC0016407	CLC0016407	3/31/2014			NYU Investment Watch List			
PX0049	CLC0016624	CLC0016626	8/19/2014			NYU Retirement Committee Meeting Minutes			
PX0050	CLC0018329	CLC0018330	9/25/2009			Fidelity Ltr to Abban re Response to NYU Retirement Programs RFP			
PX0051	CLC0018331	CLC0018338	9/25/2009			Fee Disclosure Documents			
PX0052	CLC0018339	CLC0018369	9/30/2009			Monitoring Report			
PX0053	CLC0018371	CLC0018371	9/30/2009			NYU RFP Fidelity			
PX0054	CLC0018372	CL00018386	9/25/2009			Fidelity Fee Schedule			
PX0055	CLC0018487	CLC0018530	9/1/2009	(164-070)	Ex. 061	FAScore Production Information	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0056	CLC0018555	CLC0018558	9/24/2009			FAScore Recordkeeping Services			
PX0057	CLC0018563	CLC0018593	9/30/2009			Ltr to Rezler			
PX0058	CLC0018594	CLC0018594	9/30/2009			Monitoring Report			
PX0059	CLC0018595	CLC0018595	9/30/2009			NYU RFP GreatWest			
PX0060	CLC0018596	CLC0018626	9/30/2009			TIAA Cref RFP			
PX0061	CLC0018627	CLC0018646	9/30/2009			Monitoring Report			
PX0062	CLC0019117	CLC0019132	2/25/2010			Monitoring Report			
PX0063	CLC0019216	CLC0019216	3/18/2010			TIAA Follow up Qs			
PX0064	CLC0019217	CLC0019217	3/18/2010			NYU Retirement Committee Meeting Agenda			
						NYU Revised TIAA-CREF Pricing Under NYU RFP			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0065	CLC0019278	CLC0019329	9/25/2009	Vanguard Rep		Vanguard's Response to RFP	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0066	CLC0019330	CLC0019330	6/30/2009			Investment Lineup Performance Analysis	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0067	CLC0019332	CLC0019332	9/30/2009			Investment Lineup Performance Analysis	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0068	CLC0019333	CLC0019333	9/25/2009			Fee Proposal: Vanguard's All-In-Fee Disclosure for the NYU / NYUSOM / NYUHC Plans	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0069	CLC0019334	CLC0019334	9/30/2009			Vanguard RFP	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0070	CLC0019336	CLC0019337	9/25/2009			Vanguard Ltr to Rezler re RFP	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0071	CLC0019365	CLC0019365	5/20/2016			NYU Bi-Weekly Project Status Meeting Notes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0072	CLC0020904	CLC0020910	2/9/09			Re: FW: Defined Contribution Plans	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX073-074.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0073	CLC0020929	CLC0020929	2/11/2009			Attachment to CLC0020931: DC Retirement Plan Review			
PX0074	CLC0020930	CLC0020930	2/3/2009			Attachment to CLC0020931: NYU_Vendor Release of Information Letter			
PX0075	CLC0020931	CLC0020933	10/8/2008			Defined Contribution Retirement Plan Meeting Notes			
PX0076	CLC0020992	CLC0020995	3/9/2009			RE: NYU Langone Medical Center Retirement Plans Fiduciary Review	Incomplete per FRE 106. Pls' Ex. Does not contain the full e-mail exchange, the full document is (CLC0021015-16)	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0077	CLC0021056	CLC0021056	3/26/2009			RE: TIAA PROPOSAL	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX077	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0078	CLC0021057	CLC0021074	3/24/2009			Attachment to CLC0021056: NYU_TIAA-CREF Proposal			
PX0079	CLC0021123	CLC0021125	4/8/2009			RE: Discuss the contract			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0080	CLC0021279	CLC0021285	4/14/2009			RE: NYU Langone Medical Center Retirement Plans Fiduciary Review -- Vanguard Bad Address Report			
PX0081	CLC0021380	CLC0021380	4/23/2009			RE: Conversation before presentation to Retirement Committee			
PX0082	CLC0021956	CLC0021957	7/8/2009			Email Meagher to Levy Re: RFP			
PX0083	CLC0022193	CLC0022193	8/7/2009			Email Levy to Benson (cc Webb) Re: Service Agreement			
PX0084	CLC0021415	CLC0021416	4/30/2009			RE: Conference Call Email Rezler ot Meagher			
PX0085	CLC0022444	CLC0022447	9/25/2009			Re: NYU Controlled Group Defined Contribution Retirement Plans RFP Email Webb to Meagher			
PX0086	CLC0022546	CLC0022546	10/30/2009			Re: Terminated employee account balances by fund, July invoice			
PX0087	CLC0021422	CLC0021424	4/30/2009			RE: Presentation Topics for 5/15 10 a.m. DC Retirement Plans meeting	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX109.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0088	CLC0023277	CLC0023277	12/29/2009			Email - RFP finalist follow-up meeting	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX191	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0089	CLC0021450	CLC0021453	5/8/2009			RE: NY Langone DC Retirement Plan Documents			



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PX0090	CLC0021464	CLC0021464	5/8/2009		Email - NYU University Loan report		Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX112.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0091						Intentionally Left Blank			
PX0092	CLC0021486	CLC0021487	5/12/2009		RE: TIAA - Cammack clarification discussion		Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0093.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0093	CLC0021488	CLC0021490	5/12/2009		Attachment to CLC0021488: Untitled document attachment		Cummulative of PX0092. Description does not match the document listed. Attachment is to CLC0021486.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0094	CLC0021491	CLC0021492	5/12/2009		RE: 2 questions for you				

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0095	CLC0021493	CLC0021495	5/13/2009			Email Webb to Sanchex and Meagher Re: Presentation Topics for 5/15 10 a.m. DC Retirement Plans meeting	Description does not match the document listed as it is not an attachment. Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX096.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0096	CLC0021496	CLC0021643	5/15/2009	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report			
PX0097	CLC0021664	CLC0021665	5/14/2009			Email - TIAA loan summary statement request by Cammack			
PX0098	CLC0021674	CLC0021675	5/28/2009			Email Meagher to Levy		PX0098 is an email between Cammack and NYU discussing a key issue for both parties--the NYU RFP for a sole recordkeeper in 2009 for the two plans at issue. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0098	CLC0021676	CLC0021676	5/28/209			Attachment to CLC0021674: mm14.vcf - vcard	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan. Incomplete document per FRE 106. The exhibit lists its attachments as separate exhibits. PX1641-7.		
PX0099	CLC0021886	CLC0021886	6/22/2009			Email - RFP Pricing	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0099	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0099	CLC0021887	CLC0021887	6/22/2009			Attachment to CLC0021886: VCARD			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0100	CLC0021919	CLC0021920	7/2/2009			Email Kennedy to Sanchez, Webb, and Meagher RE: 403(b) Plan RFP	Description does not match the document listed as it is not an attachment. Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0102.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0101	CLC0021888		6/22/2009	Margaret Meagher Depo		Email from J. Levy at Cammack to M. Meagher regarding RFP Pricing	Description does not match the document listed as it is not an attachment.	Plaintiffs have revised the description to address Defendant's objection.	
PX0102	CLC0021921	CLC0021922	7/2/2009			Attachment To CLC0021919: Summary of Vendor Responses to Requests for Additional Information			
PX0103	CLC0021951	CLC0021952	7/7/2009			Attachment to CLC0021946: Vendor Fees and Proprietary vs Non-proprietary Funds	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0110	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0104	CLC0021923	CLC0021924	7/2/2009			Email Meagher to Levy Re: What we'd like to do	Description does not match the document listed as it is not an attachment. Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0105.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0105	CLC0021925	CLC0021925	7/2/2009			Attachment to CLC0021923: vcard			
PX0106	CLC0021929	CLC0021929	7/3/2009			RE: 403(b) Plan RFP			
PX0107	CLC0021930	CLC0021933	7/6/2009			RE: 403(b) Plan RFP			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0108	CLC0021934	CLC0021934	7/6/2009			Vendor Outline	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0109	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0109	CLC0021946	CLC0021950	7/7/2009			RE: 403(b) Plan RFP			
PX0110	CLC0021954	CLC0021954	7/8/2009			Email - Rfp			
PX0111	CLC0021965	CLC0021966	7/8/2009			FWD: Re: 403(b) Plan RFP			
PX0112	CLC0021981	CLC0021983	7/13/2009			RE:	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0112	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0112	CLC0021984	CLC0021984	7/13/2009			Attachment to CLC0021981: vcard			
PX0113	CLC0022206	CLC0022207	8/21/2009			RE: NYU Controlled Group RFP	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0113	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0114	NYU0096711	NYU009670	4/8/2009	Jan Rezler Depo		Cammack Investment Advisory Services Agreement			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0115	CLC0022001	CLC0022001	7/16/2009	Jan Rezler Depo		Kennedy email to Sanchez re NYU Target Date 2nd Q.	Incomplete document per FRE 106. The exhibit lists its attachments as separate exhibits. PX0116-7	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0116	CLC0022002	CLC0022008	7/14/2009			Attachment to CLC0022001: NYU Target Date 2ndQ			
PX0117	CLC0022009	CLC0022009	7/13/2009			Attachment to CLC0022001: target date glid path			
PX0118	CLC0022135	CLC0022135	7/27/2009			Email - NYU Defined Contribution Plans Request for Proposal	Incomplete document per FRE 106. The exhibit lists its attachments as separate exhibits. PX0119; PX0089	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0119	CLC0022136	CLC0022157	7/27/2009			Attachment to CLC0022135: Final NYU Defined Contribution Retirement Plans RFP Questionnaire			
PX0120	CLC0022208	CLC0022230	8/18/2009			Attachment to CLC0022206: August 18 Re-draft_NYU_Defined Contribution Retirement Plans RFP Questionnaire (3)			
PX0121	CLC0022314	CLC0022315	8/31/2009			RE: NYU RFP			
PX0122	CLC0022316	CLC0022320	9/3/2009			FW: NYU Controlled Group RFP	Incomplete document per FRE 106. The exhibit lists its attachments as separate exhibits. PX0123-4	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0123	CLC0022321	CLC0022344	9/3/2009			Attachment to CLC0022316: NYU_Defined Contribution Retirement Plans RFP Questionnaire Final Version			
PX0124	CLC0022345	CLC0022345	9/4/2009			Attachment to CLC0022346: Email - NYU Controlled Group Defined Contribution Retirement Plans RFP			
PX0125	CLC0022400	CLC0022402	9/9/2009			RE: NYU Controlled Group Defined Contribution Retirement Plans RFP	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0130	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0126	CLC0022346	CLC0022347	9/4/2009			New York University - 403(b) - 457(b) Request For Proposal (261 KB)	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0128.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0127	CLC0022468	CLC0022474	9/25/2009			RE: NYU Controlled Group Defined Contribution Retirement Plans RFP			
PX0128	CLC0022348	CLC0022371	9/3/2009			Cammack DC RFP			
PX0129	CLC0022492	CLC0022492	10/21/2009			Email - Review of rfp responses			
PX0130	CLC0022448	CLC0022448	2/28/2009			Investment Breakdown - NYU, NYU Langone, & NYU Polytech Retirement Plan Breakdown			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0131	CLC0022496	CLC0022496	10/26/2009			Email - RFP report	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0132	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0132	CLC0022497	CLC0022514	10/26/2009			Attachment to CLC0022496: NYU RFP Results Report			
PX0133	CLC0022519	CLC0022519	10/27/2009			Email - Updated Analysis	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0134	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0134	CLC0022520	CLC0022545	10/27/2009			Attachment to CLC0022519: NYU_RFP Results Draft Final			
PX0135	CLC0022723	CLC0022723	12/15/2009			Attachment to CLC0022724: NYU-Nancy Sanchez e-mail			
PX0136	CLC0022724	CLC0022732	12/15/2009			RE_Participant Account Balance Report			
PX0137	CLC0022547	CLC0022547	7/23/2009			Cammack Invoice - Investment Advisor Fees			
PX0138	CLC0022571	CLC0022572	11/19/2009	Margaret Meagher Depo		Email from M. Webb to M. Meagher regarding reduce lineup			
PX0139	CLC0022617	CLC0022620	12/1/2009			Email exchange re: Vanguard Accounts	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0140	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0140	CLC0022621	CLC0022621	12/1/2009			NYU Vangaurd participant balances			
PX0141	CLC0022622	CLC0022623	11/30/2009			RE: Finalist meetings			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0141	CLC0022794	CLC0022805	12/15/2009			Attachment to CLC0022785: Untitled document attachment			
PX0142	CLC0022631	CLC0022634	12/2/2009			RE: Finalist meetings			
PX0143	CLC0022650	CLC0022653	12/2/2009			Re: Finalist meetings	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0143	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0143	CLC0022654	CLC0022654	12/2/2009			Attachment to CLC0022650: vcard			
PX0144	CLC0022810	CLC0022811	12/16/2009			Email Levy to Meagher Re: Request for Proposals	Description does not match the document listed as it is not an attachment. Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0146 and PX0153.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0145	CLC0022681	CLC0022681	12/7/2009			Email - Fiduciary oversight for 2010	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0135	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0146	CLC0022812	CLC0022869	9/25/2009			Attachment to CLC0022870: NYU RFP Response			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0147	CLC0023345	CLC0023345	1/29/2010			Email - Follow-up for TIAA-CREF	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0150	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0148	CLC0022733	CLC0022733	12/15/2009			Email - Emails			
PX0149	CLC0022785	CLC0022793	12/16/2009			RE: Participant Account Balance Report	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0141	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0150	CLC0023346	CLC0023347	1/29/2010			Attachment to CLC0023345: NYU_TIAA Follow Up_FULL LIST OF QUESTIONS			
PX0151	CLC0023420	CLC0023422	3/8/2010			Hueber email to Levy re TIAA-CREF Follow-Up	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0152	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0152	CLC0023423	CLC0023423	3/8/2010			Overview of Additional TIAA-CREF NYU Offerings			
PX0153	CLC0022870	CLC0023271	9/25/2009			TIAA-CREF_Response_to_NYU			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0154	CLC0023275	CLC0023276	12/19/2009			Email - Billing; Attachment to CLC0023275: vcard	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0154	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0154	CLC0023276	CLC0023276	12/19/2009			Attachment to CLC0023275: vcard			
PX0155	CLC0023331	CLC0023336	1/18/2010			FW: Update	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0155	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0156	CLC0023337	CLC0023342	1/18/2010			Attachment to CLC0023331: Untitled document attachment			
PX0157	NYU0000244	NYU0000257	3/10/2008	Mark Petti Depo		TIAA Recordkeeping Services Agreement			
PX0157	NYU0000274	NYU0000275	3/10/2008	Mark Petti Depo		Amend No. 2 to Recordkeeping Services Agreement between TIAA and NYU			
PX0157	NYU0023827	NYU0023828	7/21/2008			Amendment No. 1 to the Record Keeping Services Agreement			
PX0157	TIAA_NYU_00015477	TIAA_NYU_00015487	5/27/2010			Addendum to the Record Keeping Services Agreement			
PX0157	NYU0000276	NYU0000276	9/26/2011			Addendum to Schedule B of the TIAA Record Keeping Agreement			
PX0157	NYU0000241	NYU0000243	7/9/2012			Amendment No. 3 to the Record Keeping Services Agreement			
PX0157	CLC0004698	CLC0004703	9/18/2015			Amendment No. 4 to the Record Keeping Services Agreement			
PX0157	CLC0004669	CLC0004671				Amendment No. 5 to the Record Keeping Services Agreement			
PX0158	CLC0020174	CLC0020218	1/2/2014			Appendix C - Sample Enrollment Kit.pdf			
PX0158	CLC0020219	CLC0020226	4/7/2014			Appendix D - City of San Jose Distribution Guide.pdf			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0158	CLC0020227	CLC0020243	11/3/2014			Appendix E - Sample Sponsor Quarterly Report.pdf			
PX0158	CLC0020171	CLC0020173	12/2/2014			Appendix B - Sample Participant Statement .pdf			
PX0158	CLC0020248	CLC0020248	8/26/2016			Appendix G - TD Ameritrade SDBA Commission Schedule.pdf			
PX0158	CLC0020158	CLC0020158	11/15/2016			Tab 3 - Exceptions to Terms and Conditions.pdf			
PX0158	CLC0020108	CLC0020108	11/16/2016			Voya's Response - NYU Request for Proposal .msg			
PX0158	CLC0020109	CLC0020109	11/16/2016			Tab 0 - Table of Contents.pdf			
PX0158	CLC0020110	CLC0020111	11/16/2016			Tab 1 - Cover Letter.pdf			
PX0158	CLC0020112	CLC0020157	11/16/2016			Tab 2 - Questionnaire.pdf			
PX0158	CLC0020159	CLC0020162	11/16/2016			Tab 4 - Service Capabilities.pdf			
PX0158	CLC0020244	CLC0020247	11/16/2016			Appendix F - Technology Demos.pdf			
PX0158	CLC0020163	CLC0020170	11/14/2017			Appendix A - NYU Project Plan.pdf			
PX0159	CLC0023365	CLC0023366	2/16/2010			RE: Contact Information	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX201.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0160	CLC0023374	CLC0023376	2/18/2010			RE: TIAA-CREF	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0160	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0161	CLC0023384	CLC0023385	2/22/2010			Email - NYU Pricing Follow-UP			
PX0162	CLC0023386	CLC0023388	2/24/2010			Email - TIAA-CREF Pricing Follow-Up for NYU			
PX0163	CLC0023393	CLC0023395	2/25/2010			RE: Fwd: Fwd: Signature Ready Form 500 Preparation Service			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0164	CLC0023417	CLC0023418	3/8/2010			RE: TIAA-CREF Follow-Up	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0165	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0165	CLC0023419	CLC0023419	3/8/2010			Attachment to CLC0023417: Overview of Additional TIAA-CREF NYU Offerings			
PX0166	NYU0000262	NYU0000272	1/1/2012	Mark Petti Depo		Vanguard Recordkeeping Fee Agreement			
PX0167	NYU0095374	NYU0095397	9/15/2015			Retirement Choice Plus Annuity Contract: CE-102195			
PX0168	CLC0023433	CLC0023437	3/9/2010			RE: TIAA-CREF Follow-Up			
PX0169	CLC0023452	CLC0023456	3/9/2010			RE: NYU Committee meeting			
PX0170	CLC0023501	CLC0023501	3/15/2010			Email - TIAA-CREF Issues: NYU Pricing and TIAA Stable Value Call with Cammack Team			
PX0171	CLC0023502	CLC0023503	3/12/2010			Email - Due Diligence Proposal	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0171	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0172	CLC0023504	CLC0023511	3/12/2010			Attachment to CLC0023502: NYU_Retirement Plan Due Diligence Consulting Services Proposal			
PX0173	CLC0023521	CLC0023521	3/18/2010			Email from Levy to Woodruff re Retirement Committee Meeting 3-18-10	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0174	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0174	CLC0023522	CLC0023539	3/18/2010			NYU Committee Meeting March 18, 2010			
PX0175	CLC0023557	CLC0023564	3/23/2010			RE: Fwd: Signature Ready Form 500 Preparation Service			
PX0176	CLC0023632	CLC0023632	4/2/2010			Email - Revised Proposal	Incomplete document per FRE 106. The exhibit lists its attachment as separate exhibits. PX0177-8	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0177	CLC0023633	CLC0023640	4/2/2010			Attachment to CLC0023632: NYU Retirement Plan Due Diligence Consulting Services Proposal Redlined			
PX0178	CLC0023641	CLC0023648	4/2/2010			Attachment to CLC0023632: NYU Retirement Plan Due Diligence Consulting Services Proposal			
PX0179	CLC0023649	CLC0023649	4/5/2010	Nancy Sanchez Depo		Email from J. Rezler to N. Sanchez re Clarifications from March 18 Meeting and Top Reasons to Consolidate Vendors	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0180-82	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0180	CLC0023650	CLC0023650	4/19/2010			Clarifications of several items discussed at 3/18/2010 meeting			
PX0181	CLC0023651	CLC0023652	4/19/2010			Advantages of Consolidating an ERISA 403(b) Program into a Single Investment Provider Arrangement			
PX0182	CLC0023653	CLC0023653	4/19/2010			NYU, NYU Langon, and NYU Polytechnic 403(B) and 457(B) Plans RFP and Due Diligence Process			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0183	CLC0023667	CLC0023667	4/9/2010			Email - NYU	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0184	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0184	CLC0023675	CLC0023675	4/19/2010			NYU Retirement Committee Meeting Agenda			
PX0185	CLC0023676	CLC0023680	3/18/2010			NYU Retirement Committee Meeting Minutes			
PX0186	CLC0023714	CLC0023714	5/21/2010			Email - Talking Points	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0187	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0187	CLC0023715	CLC0023717	5/21/2010			Attachment to CLC0023714: NYU_Vendor Consolidation Talking Points May 2010			
PX0188	CLC0023927	CLC0023928	6/11/2010			RE: NYU			
PX0189	CLC0023929	CLC0023931	6/14/2010	(164-143)	Ex. 133	Abban email to Levy re NYU	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0190	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0190	CLC0023932	CLC0023932	6/16/2010			Attachment to CLC0023933: Re: NYU Retirement Committee Charter Resolution approving Establishment of Retirement Plan Committee - The Executive Committee of the Board of Trustees of NYU			
PX0191	CLC0023933	CLC0023942	4/20/2009						

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PX0192	CLC0023943	CLC0023947	6/17/2010			RE: [Fwd: New restrictions on mutual fund transactions for non-U.S. resident participants in your retirement plan(s)]			
PX0193	CLC0023956	CLC0023956	6/24/2010			Email - NYU Foreign Contract Issue			
PX0194	CLC0024033	CLC0024034	7/9/2010			RE: Forfeiture accounts - application for TIAA and CREF Retirement Choice Plus annuity contract			
PX0195	CLC0024062	CLC0024064	7/14/2010			Re: Third Country Nationals NYU Retirement Committee Meeting Minutes			
PX0196	CLC0024076	CLC0024078	6/14/2010	Patricia Halley Depo		Re: June 14 Retirement Committee meeting minutes, etc.			
PX0197	CLC0024092	CLC0024093	7/16/2010			RE: Forfeiture accounts - application for TIAA and CREF Retirement Choice Plus annuity contract			
PX0198	CLC0024193	CLC0024197	8/9/2010			Email - NYU			
PX0199	CLC0024250	CLC0024251	9/10/2010			RE: Follow Up			
PX0200	CLC0024288	CLC0024290	9/13/2010			Email - Just checking in			
PX0201	CLC0024330	CLC0024330	9/21/2010			RE: Retirement Committee Meeting			
PX0202	CLC0024368	CLC0024370	9/22/2010			RE: Retirement Committee Meeting			
PX0203	CLC0024371	CLC0024374	9/22/2010			RE: T/C Update			
PX0204	CLC0024412	CLC0024413	10/4/2010						
PX0205	CLC0024440	CLC0024442	10/5/2010			FW: T/C Update	Incomplete document per FRE 106. The exhibit lists its attachment as separate exhibits. PX0162-3	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0206	CLC0024443	CLC0024446	10/5/2010			Attachment to CLC0024440: Re_ TIAA-CREF and Foreign Participant Update			
PX0207	CLC0024447	CLC0024458	10/5/2010			Attachment to CLC0024440: [Fwd_ [Fwd_ RE_ Third Country Nationals & T_C]]			
PX0208	CLC0024459	CLC0024459	10/5/2010			Attachment to CLC0024440: 2010-7-27 NYU Global Sites Corporate summary			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0209	CLC0024489	CLC0024489	10/11/2010			Email - NYU	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX299.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0210	CLC0024531	CLC0024533	10/22/2010			RE: TIAA-CREF Foreign Participants	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX302.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0211	CLC0024498	CLC0024500	10/14/2010			RE: TIAA-CREF Foreign Participant Issue			
PX0212	CLC0024597	CLC0024598	10/28/2010			Treatment of Foreign Participants Under a TIAA Single Source Recordkeeping Platform	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0213.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0213	CLC0024599	CLC0024601	10/28/2010			Attachment to CLC0024957: NYU Fact Sheet_Foreign Employees			
PX0214	CLC0024624	CLC0024626	11/1/2010			Re: Treatment of Foreign Participants Under a TIAA Single Source Recordkeeping Platform			
PX0215	CLC0024632	CLC0024633	11/2/2010	Tina Suhr Depo	Exhibit 114	Rezler email to Woodruff re Refresh my memory (vanguard funds)			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0216	CLC0024824	CLC0024829	11/9/2010			RE: TIAA-CREF Pricing Follow-Up for NYU	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0217	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0217	CLC0024830	CLC0024830	11/9/2010			Attachment to CLC00248224: NYU_Pricing			
PX0218	CLC0024846	CLC0024849	1/11/2010			RE: TIAA-CREF Pricing Follow-Up for NYU			
PX0219	CLC0024855	CLC0024855	11/11/2010			Email - NYU - Update	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0220	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0220	CLC0024856	CLC0024856	11/11/2010			Attachment to CLC0024855: NYU Lineup 11.10 update Grid update 7.5 inst			
PX0221	CLC0024857	CLC0024858	11/12/2010			Email - TIAA-CREF Meeting Follow-Up	Incomplete document per FRE 106. The exhibit lists its attachments as separate exhibits. PX0222-4	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0222	CLC0024859	CLC0024859	11/13/2010			Attachment to CLC0024857: Vanguard ShareClassMinimums			
PX0223	CLC0024860	CLC0024872	11/14/2010			Attachment to CLC0024857: VanguardPerformance			
PX0224	CLC0024873	CLC0024877	11/15/2010			Attachment to CLC0024857: NYU Fee Disclosure			
PX0225	CLC0024878	CLC0024879	11/17/2010			RE: Summary for NYU			
PX0226	CLC0024908	CLC0024909	11/18/2010			Re: Minutes and Conversion summary			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0227	CLC0024910	CLC0024912	11/18/2010			Attachment to CLC0024908: Untitled document attachment			
PX0228	CLC0024913	CLC0024914	11/19/2010			RE: Minutes and Conversion summary			
PX0229	CLC0024991	CLC0024991	11/26/2010			Email - Thoughts on Sole Recordkeeper	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0230	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0230	CLC0024992	CLC0024994	11/27/2010			Attachment to CLC0024991: Reasons to Consolidate to a Single Recordkeeper			
PX0230	CLC0024995	CLC0024995	11/28/2010			Attachment to CLC0024991: ATT16698.txt			
PX0231	CLC0024997	CLC0024997	12/6/2010			Email - Revised consolidation summary	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0232	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0232	CLC0024998	CLC0025005	12/6/2010			Attachment to CLC0024997: NYU Vendor Consolidation Overview For Core Leadership_December 2010			
PX0233	CLC0025019	CLC0025021	12/13/2010			RE: Revised consolidation summary			
PX0234	CLC0025029	CLC0025031	12/13/2010			RE: Revised consolidation summary	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0235	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0235	CLC0025032	CLC0025039	12/13/2010			Attachment to CLC0025029: NYU Vendor Consolidation Overview For Core Leadership_December 2010_v2			
PX0236	CLC0025040	CLC0025042	12/14/2010			RE: Revised consolidation summary	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0237	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0237	CLC0025043	CLC0025050	12/14/2010			Attachment to CLC0025040: NYU Vendor Consolidation Overview For Core Leadership_December 201			
PX0238	CLC0025062	CLC0025062	12/14/2010			FW:	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0239	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0239	CLC0025063	CLC0025070	12/14/2010			Attachment to CLC0025062: tiaa recordkeeping presentation by cammac			
PX0240	CLC0024346	CLC0024347	9/22/2010			Email Rezler to Meagher Re: Retirement Committee Meeting			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0241	CLC0036537	CLC0036537	2/11/2013			Email Wrightson to Petti, Hollnsteiner, and Meagher Re: NYU Retirement Committee Meeting Materials			
PX0242	CLC0036538	CLC0036538	2/22/2013			Attachment to CLC0036537: NYU Retirement Committee Meeting Agenda			
PX0243	CLC0036539	CLC0036543	2/22/2013			Attachment to CLC0036537: CLC Current and Sample Investment Grids			
PX0244	CLC0025180	CLC0025181	1/5/2011			RE: NYU Ret Comm Mtg agenda			
PX0245	CLC0025184	CLC0025185	1/6/2011			RE: NYU Ret Comm Mtg agenda	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0246	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0246	CLC0025186	CLC0025193	1/6/2011			Attachment to CLC0025184: NYU_Vendor Consolidation Overview For Core Leadership_January 201			
PX0247	CLC0025203	CLC0025206	1/7/2011	Linda Woodruff Depo	Exhibit 9	Meagher email to Woodruff re NYU Ret Comm Mtg Agenda			
PX0248	CLC0025215	CLC0025218	1/7/2011			Re: NYU Ret Com Mtg agenda			
PX0249	CLC0025242	CLC0025246	1/7/2011	Margaret Meagher / Patricia Halley Depo		Email from M. Meagher to J. Rezler regarding full review twice a year			
PX0250	CLC0025281	CLC0025281	1/14/2011			Email - TIAA-CREF Checking In			
PX0251	CLC0025309	CLC0025309	3/21/2011			NYU TIAA-CREF Pricing Proposal			
PX0252	CLC0025310	CLC0025318	1/1/2011			NYU and NYULMC Retirement Plan Vendor Consolidation			
PX0253	CLC0025332	CLC0025333	1/20/2011			RE: Revised Exec Summary and Pricing Illustration	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0254	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0254	CLC0025334	CLC0025334	1/20/2011			Attachment to CLC0025332: NYU_TIAA_Pricing Illustration			
PX0255	CLC0025360	CLC0025362	1/21/2011			RE: Revised Exec Summary and Pricing Illustration			
PX0256	NYU0095635	NYU0095666	9/15/2015			Retirement Choice Plus Annuity Contract: TE-102195			
PX0257	CLC0025377	CLC0025379	1/26/2011			RE: Revised Exec Summary and Pricing Illustration	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0258	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0258	CLC0025380	CLC0025384	1/26/2011			Attachment to CLC0025377: NYU_WS_Vendor Change FAQs 2011_DRAF			
PX0259	CLC0025385	CLC0025386	1/31/2011			Re: Fw: NYU Vendor Consolidation Overview			
PX0260	CLC0025390	CLC0025392	2/1/2011			RE: Fw: NYU Vendor Consolidation Overview	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0261	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0261	CLC0025393	CLC0025401	2/1/2011			Attachment to CLC0025390: NYU_Vendor Consolidation Overview For Core Leadership_February 2011_Fina			
PX0262	CLC0025402	CLC0025404	2/1/2011			Re: Fw: NYU Vendor Consolidation Overview			
PX0263	CLC0025409	CLC0025409	2/1/2011			Email - Checking In			
PX0264	CLC0025429	CLC00254231	2/2/2011			Re: Can I find this out?			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0265	CLC0025437	CLC0025438	2/7/2011			FW: Meeting minutes and draft IPS	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX02669-7.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0266	CLC0025439	CLC0025443	2/7/2011			Attachment to CLC0025437: IPS_sample draft short_20080214 with brokerage			
PX0267	CLC0025444	CLC0025447	2/7/2011			Attachment to CLC0025437: NYU_RetirementCommitteeMinutes_Jan2011			
PX0268	CLC0025500	CLC0025501	2/10/2011			Email - Question Regarding Foreign Participants			
PX0269	CLC0025505	CLC0025506	2/13/2011			RE: NYU			
PX0270	CLC0025507	CLC0025508	2/14/2011			Re: Meeting minutes and draft IPS	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0271.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0271	CLC0025509	CLC0025512	2/14/2011			Attachment to CLC0025507: NYU_RetirementCommitteeMinutes_Jan2011 v2			
PX0272	CLC0025539	CLC0025541	2/18/2011			RE: NYU Follow-Up			
PX0273	CLC0025542	CLC0025542	2/23/2011			Email - NYU			
PX0274	CLC0025545	CLC0025546	2/24/2011			Email - Vendor Consolidation	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0275.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0275	CLC0025547	CLC0025547	2/24/2011			Attachment to CLC0025545: NYU Vanguard Assets and Fund Usage			
PX0276	CLC0025561	CLC0025562	3/2/2011			RE: Meeting minutes and draft IPS	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0277	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0277	CLC0025563	CLC0025566	3/2/2011			Attachment to CLC0025561: NYU_RetirementCommitteeMinutes_Jan2011 v3			
PX0278	CLC0025576	CLC0025578	3/7/2011			RE: Meeting minutes and draft IPS			
PX0279	CLC0025579	CLC0025579	3/7/2011	Linda Woodruff Depo	Exhibit 10	Woodruff email to Rezler re IPS			
PX0280	CLC0025580	CLC0025583	3/7/2011			Re: Meeting minutes and draft IPS	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0281.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0281	CLC0025584	CLC0025587	3/7/2011			Attachment to CLC0025580: NYU_RetirementCommitteeMinutes_January2011			
PX0282	CLC0025596	CLC0025600	3/11/2011			Re: Vendor Consolidation			
PX0283	CLC0025601	CLC0025601	3/15/2011			Re: IPS			
PX0284	CLC0025602	CLC0025605	3/15/2011			RE: Meeting minutes and draft IPS	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0285.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0285	CLC0025606	CLC0025609	1/10/2011			Attachment to CLC0025602: NYU_RetirementCommitteeMinutes_January2011 v5			
PX0286	CLC0025610	CLC0025611	3/16/2011		RE: IPS		Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX431.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0287	CLC0025612	CLC0025619	3/16/2011			Attachment to CLC0025610: Investment Policy Statement combined			
PX0288	CLC0025633	CLC0025637	3/17/2011		Re: Vendor Consolidation		Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0287.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0289	CLC0025638	CLC0025638	3/17/2011			Attachment to CLC0025633: NYU_ParticipantUsagebyVendor			
PX0290	CLC0025642	CLC0025642	3/18/2011		Email - NYU Retirement Committee Meeting		Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0291-5.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0291	CLC0025643	CLC0025760	3/18/2011			Attachment to CLC0025642: 4th QTR 2010.zip?NYU_DD_4Qtr_2010			
PX0292	CLC0025761	CLC0025779	3/18/2011			Attachment to CLC0025642: 4th QTR 2010.zip?NYU_DD_4Qtr_2010(A bridged)			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0293	CLC0025780	CLC0025780	3/18/2011			Attachment to CLC0025642: NYU_TIAA_Pricing Illustration_January 2011			
PX0294	CLC0025781	CLC0025785	3/21/2011			NYU Retirement Program FAQs			
PX0295	CLC0025786	CLC0025794	3/18/2011			Attachment to CLC0025642: NYU_Vendor Consolidation Overview For Core Leadership_February 2011_Final			
PX0296	CLC0025806	CLC0025806	3/20/2011			Email Levy to Meagher Re: Presentation	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0297. Description does not match the document listed.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0297	CLC0025807	CLC0025855	3/20/2011			Attachment to CLC0024806: NYU_Plan Changes Proposal DRAFT			
PX0298	CLC0025857	CLC0025857	3/21/2011			Re: NYU			
PX0299	CLC0025858	CLC0025859	3/22/2011			RE: NYU	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0300-2.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0300	CLC0025860	CLC0025867	3/25/2009			Attachment to CLC0025858: tiaa_trad_whitepaper			
PX0301	CLC0025868	CLC0025869	12/31/2010			Financial Strength The TIAA General Account			
PX0302	CLC0025870	CLC0025871	3/22/2011			Attachment to CLC0025858: TIAA-RA			
PX0303	CLC0025872	CLC0025874	3/24/2011			RE: NYU			
PX0304	CLC0025906	CLC0025908	3/28/2011			Fwd: Re: Agenda plus for Fri Ret Comm			

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PX0305	CLC0025915	CLC0025917	3/28/2011			Re: Agenda plus for Fri Ret Comm	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0306.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0306	CLC0025918	CLC0025918	3/28/2011			Attachment to CLC0025915: 2011-2012 Ret Comm Calendar v1			
PX0307	CLC0026358	CLC0026358	3/31/2011			Attachment to CLC0026357: NYU_April Meeting Agenda Timeline			
PX0308	CLC0026357	CLC0026357	3/31/2011			Email - Meeting agenda timeline	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0307.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0309	CLC0026366	CLC0026367	4/1/2011			Email - Cammack sample client listing			
PX0310	CLC0026368	CLC0026368	4/1/2011			Attachment to CLC0026366: Higher Education & Tax Exempt Sample Client List_4-2011			
PX0311	CLC0026416	CLC0026416	4/15/2011			Fwd: Investment Policy Statement Scanned Document	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0312.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0312	CLC0026417	CLC0026424	4/15/2011			Attachment to CLC0026416: Investment Policy Statement			
PX0313	CLC0026432	CLC0026434	4/15/2011			Re: Complying with new fee disclosure regulations			

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PX0314	CLC0026437	CLC0026438	4/19/2011			Updated: NYU Langone SRK Prep Meeting		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).	
PX0315	CLC0026456	CLC0026456	4/20/2011			Email - Proposed Agenda	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0316.	"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0316	CLC0026457	CLC0026457	4/20/2011			Attachment to CLC0026456: NYU_Consolidation Agenda		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).	
PX0317	CLC0026542	CLC0026542	5/27/2011			FW: Chris Garrison	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0318-9.	"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0318	CLC0026543	CLC0026543	5/27/2011			Attachment to CLC0026542: Chris Garrison.vcf			
PX0319	CLC0026544	CLC0026544	4/28/2011			Attachment to CLC0026542: Chris Garrison - Bio Feb 2010			
PX0320	CLC0027119	CLC0027124	6/13/2011			Re: Forfeiture accounts - application for TIAA and CREF Retirement Choice Plus annuity contract			
PX0321	CLC0027134	CLC0027135	6/17/2011	Linda Woodruff Depo	Exhibit 11	Woodruff email to Committee re June 9 Retirement Committee Materials	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0322.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).	
PX0322	CLC0027136	CLC0027142	6/9/2011	Linda Woodruff Depo		IPS Working Draft		"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX0323	CLC0027149	CLC0027155	6/20/2011			RE: Forfeiture accounts - application for TIAA and CREF Retirement Choice Plus annuity contract			
PX0324	CLC0027191	CLC0027195	6/30/2011			RE: Getting time on our calendars	E-mail contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Further, most of the email chain included a witness who will be appearing live at trial.	
PX0325	CLC0027196	CLC0027198	6/30/2011			RE: NYU no applications signed to-date			
PX0326	CLC0027204	CLC0027204	7/6/2011			Email - For today's call			
PX0327	CLC0027231	CLC0027236	7/7/2011			Email from Meagher to Rzler re retirement choice plus contract			
PX0328	CLC0027239	CLC0027244	7/7/2011			Re: For today's call			
PX0329	CLC0027245	CLC0027246	7/7/2011			Email from garrison to Levy re NYU communications campaign	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0330.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0330	CLC0027247	CLC01027262	7/7/2011			TIAA 2011 Employee Retirement Engagement Campaign			
PX0331	CLC0027280	CLC0027280	7/7/2011			Samples for Communications & Education Camapign	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX0332-3	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0332	CLC0027281	CLC0027296	7/7/2011			NYU_CE&A_July 7 (9845).pdf			
PX0333	CLC0027297	CLC0027304	6/13/2011			Participant Communications.pdf			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0334	CLC0027350	CLC0027351	7/18/2011			Re: Retirement Committee Meeting Minutes- June 2011	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0335.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0335	CLC0027352	CLC0027353	7/18/2011			Attachment to CLC0027350: NYU_RetirementCommitteeMinutes_June2011 v2			
PX0336	CLC0027401	CLC0027401	8/3/2011			Email - Charter	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX0337-8	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0337	CLC0027402	CLC0027406	8/3/2011			Attachment to CLC0027401: NYU_Retirement_Plan_Committee_Charter_7-28-11m			
PX0338	CLC0027407	CLC0027416	8/3/2011			Attachment to CLC0027401: Ret committee charter Nancy commented version			
PX0338	CLC0027417	CLC0027417	8/3/2011			Attachment to CLC0027401: ATT08452			
PX0339	CLC0027715	CLC0027716	8/22/2011			RE: Roger Ferguson			
PX0340	CLC0027789	CLC0027791	9/6/2011			RE: Vanguard fund changes			
PX0341	CLC0027810	CLC0027817	9/6/2011			RE: NYU/ NYU Langone			
PX0342	CLC0027821	CLC0027823	9/6/2011			RE: Vanguard fund changes			
PX0343	CLC0027835	CLC0027837	9/8/2011			RE: Vanguard fund changes			
PX0344	CLC0027868	CLC0027869	9/13/2011			RE: Tomorrow			
PX0345	CLC0027873	CLC0027873	9/13/2011			Email - Cammack and TIAA-CREF			
PX0346	CLC0027908	CLC0027912	9/15/2011			RE: Vanguard fund changes			
PX0347	CLC0028203	CLC0028204	10/19/2011			RE: TIAA-CREF - A few Follo-Ups			
PX0348	CLC0028302	CLC0028302	10/31/2011			Email - Advance View of TIAA-CREF Strategy for NYU Washington Square			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0349	CLC0028323	CLC0028323	11/1/2011			Email - Summary for Tomorrow's Call	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0350	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0350	CLC0028324	CLC0028324	11/1/2011			Attachment to CLC0028323: NYU Wash Square - Strategic Timeline			
PX0351	CLC0029100	CLC0029102	11/9/2011			RE: FW: November 14 Retirement Committee Materials			
PX0352	CLC0031489	CLC0031489	2/1/2012			Cammack Invoice - Investment Advisor Fees			
PX0353	CLC0032583	CLC0032583	2/21/2012			Proposed Vote for the Retirement Plan Committee: TIAA-CREF Mutual Fund Transition to Institutional Share Classes			
PX0354	CLC0032607	CLC0032610	2/17/2012			Letter re: Adding new Institutional Share Class to the plans			
PX0355	CLC0033465	CLC0033465	5/10/2012	Lassaad Turki Depo	Exhibit 10	Wrightson email to Hollnsteiner re NYU Retirement Plan Committee Meeting - May 17, 2012	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX0356-7.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0356	CLC0033466	CLC0033587	3/31/2012	Lassaad Turki Depo		NYU_DD_03312012.pdf			
PX0357	CLC0033588	CLC0033666	3/31/2012	Lassaad Turki Depo		NYU_AbridgedDD_03312012.pdf			
PX0358	CLC0033674	CLC0033674	5/10/2012	Lassaad Turki Depo		New York University_BoardUpdateTopics_Draft.docx			
PX0359	CLC0033675	CLC0033675	5/17/2012	Lassaad Turki Depo		NYU_Meeting Agenda_17May2012.docx			
PX0360	CLC0033676	CLC0033679	2/21/2012	Lassaad Turki Depo		NYU_RetirementCommitteeMinutes_Feb2012.doc			
PX0361	CLC0035509	CLC0035511	10/4/2012	Jan Rezler Depo		Hollnsteiner email to Rezler re NYU Retirement Plan - Vanguard Fund Inquiry			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0362	CLC0036504	CLC0036507	2/1/2013			Email re: Explanation of the Return of Excess Plan Expense ("Revenue Credits")			
PX0363	CLC0036515	CLC0036521	2/4/2013			Email Rezler to Petti, Levy, Kraus, and Halley Re: Explanation of the Return of Excess Plan Expense ("Revenue Credits") and Attachments	Description does not mach the document listed.	Plaintiffs have revised the description to address Defendant's objection.	
PX0364	CLC0037197	CLC0037200	4/26/2013			Email re: FBC Inquiries			
PX0365	CLC0037908	CLC0037913	6/18/2013	Vanguard Rep		Tocci email to Rezler re NYU Washington Square Shareclass change			
PX0366	CLC0038976	CLC0038976	12/2/2013			Email Wrightson to Petti Re: NYU retirement committee meeting minutes	Description does not mach the document listed. Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX0367-0382	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0367	CLC0038977	CLC0038980	5/18/2009			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes	Description does not mach the document listed.	Plaintiffs have revised the description to address Defendant's objection.	
PX0368	CLC0038981	CLC0038984	6/14/2013			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes	Description does not mach the document listed.	Plaintiffs have revised the description to address Defendant's objection.	
PX0369	CLC0038985	CLC0038987	4/19/2010			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes	Description does not mach the document listed.	Plaintiffs have revised the description to address Defendant's objection.	
PX0370	CLC0038988	CLC0038990	4/1/2011	Lassaad Turki Depo	Exhibit 13	Attachment to CLC0038976: NYU Retirement Plan Committee Meeting Minutes	Description does not mach the document listed.	Plaintiffs have revised the description to address Defendant's objection.	
PX0371	CLC0038991	CLC0038994	8/15/2011			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0372	CLC0038995	CLC0038998	2/22/2013	Lassaad Turki Depo	Exhibit 14	Attachment to CLC0038976: NYU Retirement Plan Committee Meeting Minutes			
PX0373	CLC0038999	CLC0039002	1/10/2011			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0374	CLC0039003	CLC0039005	6/14/2010			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0375	CLC0039006	CLC0039007	6/9/2011			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0376	CLC0039008	CLC0039011	3/21/2011			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			

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PX0377	CLC0039012	CLC0039015	5/17/2012			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0378	CLC0039016	CLC0039018	11/2/2010			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0379	CLC0039019	CLC0039021	11/14/2011			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0380	CLC0039022	CLC0039024	11/16/2012			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0381	CLC0039025	CLC0039027	9/23/2010			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0382	CLC0039028	CLC0039030	9/4/2012			Attachment to CLC0038976: NYU Retirement Committee Meeting Minutes			
PX0383	CLC0039196	CLC0039201	1/22/2014	Jan Rezler Depo		Petti email to Rezler Growth Equity Fund Mergine with U.S.Growth Fund			
PX0384	CLC0041354	CLC0041357	6/19/2014			Email Neelakantan to Lucev Re: Fund Recommendations Fina	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0385-6.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0385	CLC0041358	CLC0041358	6/19/2014			Attachment to CLC0041354: Client Fund Watch List			
PX0386	CLC0041641	CLC0041643	8/11/2014			Email Meagher to Wrightson Re NYU/NYU Langone Committee Meeting Agenda	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0387.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0387	CLC0041780	CLC0041780	8/19/2014			Attachment to CLC0041641: NYU Retirement Meeting Agenda			
PX0388	CLC0041784	CLC0041859	6/30/2014			NYU, NYU LMC, and NYU Polytechnic Fiduciary Due Diligence Report			
PX0389	CLC0041860	CLC0041921	6/30/2014			NYU LMC and NYU Polytechnic Institute Supplemental Investment Information			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0390	CLC0046603	CLC0046608	7/2/2015			Email Rezler to Rezler Re: NYU Plan merger - sole record-keeper questions and information			
PX0391	CLC0046609	CLC0046609	7/2/2015			Attachment to CLC0046603: Cammack png			
PX0392	CLC0046880	CLC0046880	5/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0393	CLC0046881	CLC0046881	6/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0394	CLC0046882	CLC0046882	7/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0395	CLC0049051	CLC0049051	10/28/2015			Email Rezler to Halley, Petti, and Hollensteiner Re: Executive Summary of TIAA-CREF pricing changes	Description does not match the document; the document is an email. Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0396-7	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0396	CLC0049052	CLC0049052	10/28/2015			Attachment to CLC0049051: Picture	Description does not match the document; the document is an attachment to CLC0049051.	Plaintiffs have revised the description to address Defendant's objection.	
PX0397	CLC0049053	CLC0049054	10/27/2015			Attachment to CLC0049051: Memo Cammack to NYU HR Dept Re: NYU Cost Savings Under TIAA-CREF			
PX0398	CLC0049055	CLC0049056	10/27/2015			Attachment to CLC0049051: Memo Cammack to NYU HR Dept Re: NYU Cost Savings Under TIAA-CREF	Description does not match the document; the document is an attachment to CLC0049051.	Plaintiffs have revised the description to address Defendant's objection.	
PX0399	CLC0049094	CLC0049099	11/2/2015			Re: Executive Summary of TIAA-CREF pricing changes			
PX0400	CLC0049348	CLC0049348	11/18/2015	Jan Rezler Depo		Halley email to Rezler re meeting on Monday for Sharel Class solution for dummies			
PX0401	CLC0049936	CLC0049937	1/12/2016			Email Rezler to Halley Re: Exhibit to the NYU RIA Agreement	Description does not match the document; the document is an email. Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX745-747	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0402	CLC0049938	CLC0049947	3/10/2015			Attachment to CLC0049936: NYU 403(b) Plan Merger Considerations	Description does not match the document; the document is an attachment to CLC0049051.	Plaintiffs have revised the description to address Defendant's objection.	
PX0403	CLC0049948	CLC0049950	4/8/2009			Attachment to CLC0049936: NYU Engagement Letter Exhibit D Special Project Scope January 2016	Description does not match the document; the document is an attachment to CLC0049051.	Plaintiffs have revised the description to address Defendant's objection.	
PX0404	CLC0049951	CLC0049963	4/8/2009	Jan Rezler Depo		Attachment to CLC0049936: Cammack Investment Advisory Services Agreement			
PX0405	CLC0051336	CLC0051336	4/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0406	CLC0051338	CLC0051338	4/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0407	CLC0051492	CLC0051492	5/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0408	CLC0051495	CLC0051495	5/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0409	CLC0052742	CLC0052742	6/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0410	CLC0052744	CLC0052744	6/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0411	CLC0053647	CLC0053647	7/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0412	CLC0053669	CLC0053670	7/7/2016			Email from Rezler to Petti Re VGPMX Fund			
PX0413	CLC0053950	CLC0053951	7/27/2016			Email Rezler to Halley Re: RFP update			
PX0413	CLC0053952	CLC0053952	7/27/2016			Attachment to CLC0053950: image001			
PX0414	CLC0053997	CLC0053997	8/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0415	CLC0055195	CLC0055195	9/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0416	CLC0055204	CLC0055204	8/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0417	CLC0055205	CLC0055205	7/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0418	CLC0055302	CLC0055303	9/13/2016			Email re: Washington Square Campus Faculty Retirement Plan (Draft Responses)			
PX0419	CLC0056037	CLC0056037	10/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0420	CLC0056797	CLC0056797	11/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0421	CLC0056799	CLC0056799	11/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0422	CLC0057584	CLC0057858	11/16/2016			Email Aquilino to Rezler Re: Valic's Response to NYU RFP	Description of the document does not match the Bates number listed. The bates range is that of an email which appears to be CLC0057854. Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than one exhibit. (PX0422-3)	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0423	CLC0057583	CLC0057670	11/16/2016			Valic Vendor Operations			
PX0424	CLC0057859	CLC0057948	11/23/2016			Attachment to CLC0057854: Valic RFP Response			
PX0425	CLC0058151	CLC0058151	12/5/2016	(164-083)	Ex. 074	Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials December 12, 2016			
PX0426	CLC0059395	CLC0059395	1/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0427	CLC0059397	CLC0059397	1/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0428	CLC0060588	CLC0060588	2/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0429	CLC0060597	CLC0060597	2/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0430	CLC0061247	CLC0061248	2/16/2017			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - February 23, 2017	Description does not match the document; the document is an email. Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0428-36	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0430	CLC0061249	CLC0061249	2/16/2017			Attachment to CLC0061247: image002.png	Description does not match the document; the document is an attachment to CLC0061247.	Plaintiffs have revised the description to address Defendant's objection.	
PX0431	CLC0061250	CLC0061250	2/23/2017			Attachment to CLC0061247: NYU Retirement Committee Meeting Agenda			
PX0432	CLC0061251	CLC0061352	2/27/2017			Attachment to CLC0061247: NYU Retirement Committee Meeting Materials			
PX0433	CLC0061353	CLC0061427	2/27/2017			Attachment to CLC0061247: NYU LMC and NYU Lutheran Medical Center Supplemental Investment Information			
PX0434	CLC0061428	CLC0061432	2/27/2017			Attachment to CLC0061247: NYU, NYU SoM, and NYU Hospitals Center Retirement Plan Committee Charter			
PX0435	CLC0061433	CLC0061437	2/27/2017			Attachment to CLC0061247: NYU, NYU SoM, and NYU Hospitals Center Retirement Plan Committee Charter			
PX0436	CLC0061438	CLC0061440	12/12/2016			Attachment to CLC0061247: NYU/NYU Langone Retirement Committee Q3 2016 Due Diligence Meeting Minutes			
PX0437	CLC0061742	CLC0061742	3/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0438	CLC0061744	CLC0061744	3/1/2017			Cammack Invoice - Investment Advisor Fees			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0439	CLC0062349	CLC0062349	4/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0440	CLC0062351	CLC0062351	4/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0441	CLC0062817	CLC0062817	5/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0442	CLC0062819	CLC0062819	5/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0443	CLC0064284	CLC0064284	6/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0444	CLC0064286	CLC0064286	6/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0445	CLC0065000	CLC0065000	7/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0446	CLC0065002	CLC0065002	7/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0447	CLC0065106	CLC0065106	7/11/2017			Email Petti to Rezler Re: Important notice about Columbia U Retirement program	Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than as one exhibit. (PX0447-8)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0448	CLC0065107	CLC0065108	7/11/2017			Attachment to CLC0065106: Important notice about Columbia U Retirement program	Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than as one exhibit. (PX0447-8)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0449	CLC0065157	CLC0065158	7/11/2017			Email Petti to Rezler Re: Important notice about Columbia U Retirement program	Description of the document does not match the Bates number listed. The bates range is that of an email. Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than as one exhibit. (PX0449-52)	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0450	CLC0065159	CLC0065160	7/11/2017			Attachment to CLC0065157: Discussion Points - All Employee Deferrals under SRK be directed to GSRA - Impact on Participant Loans / Hardships	Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather as one exhibit. (PX0449-52)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0451	CLC0065161	CLC0065166	6/30/2016			Attachment to CLC0065157: TIAA and CREF contract comparison	Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than as one exhibit. (PX0449-52)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0452	CLC0065167	CLC0065187	1/18/2017			Attachment to CLC0065157: Driving Better Outcomes for Your Plan NYU RC / RCP Contracts and TIAA Traditional NYU	Incomplete per FRE 106. Family documents are listed separately on the exhibit list rather than as one exhibit. (PX0449-52)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0453	CLC0065188	CLC0065190	7/12/2017			Email from Rezier to Petter regarding Important Notice about Columbia U Retirement Program			
PX0454	CLC0065605	CLC0065605	8/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0455	CLC0065607	CLC0065607	8/1/2017			Cammack Invoice - Investment Advisor Fees			
PX0456	NYU0000277	NYU0000309	4/30/2015			Vanguard All-in Fee Disclosure			
PX0457	NYU0000385	NYU0000407	4/30/2012	Nancy Sanchez Depo		Vanguard All-in fee disclosure	Description does not match the Bates number listed; it is a Vanguard All-in fee disclosure	Plaintiffs have revised the description to address Defendant's objection.	
PX0458	NYU0002092	NYU0002094	11/25/2013			NYU Retirement Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0459	NYU0002095	NYU0002098	6/14/2013	Jan Rezler & Vanguard Rep Depo		NYU Retirement Plan Committee Meeting Minutes			
PX0460	NYU0002099	NYU0002102	3/21/2011	Nancy Sanchez & Susanna Hollnsteiner & Jan Rezler & Vanguard Rep Depo		NYU Retirement Committee Meeting Minutes			
PX0461	NYU0002242	NYU0002244	5/22/2014	Nancy Sanchez Depo		NYU Retirement Committee Meeting Minutes			
PX0462	NYU0002387	NYU0002387	9/13/2007	Susanna Hollnsteiner Depo	Exhibit 4	NYU Retirement Plan Committee Meeting Minutes			
PX0463	NYU0002388	NYU0002390	9/23/2010	Margaret Meagher & Susanna Hollnsteiner & Jan Rezler Depo		NYU Retirement Committee Meeting Minutes			
PX0464	NYU0002526	NYU0002526	2/22/2013	Patricia Halley Depo		Vanguard Share Class Change and Fee Arrangement			
PX0465	NYU0002527	NYU0002542	6/14/2013	Jan Rezler Depo		Cammack NYU Vendor Consolidation Report NYU, NYU School of Medicine, and NYU Hospitals Center Retirement Plan Committee Charter			
PX0466	NYU0002543	NYU0002547	9/28/2012						
PX0467	NYU0002557	NYU0002560	2/22/2013	Tina Suhr Depo	Exhibit 69	NYU Retirement Plan Committee Meeting Minutes			
PX0468	NYU0002566	NYU0002567	10/3/2014			NYU Retirement Committee Minutes			
PX0469	NYU0002779	NYU0002782	12/11/2014			NYU Retirement Committee Meeting Minutes			
PX0470	NYU0002885	NYU0002886	12/9/2009	Patricia Halley Depo		NYU Retirement Committee Meeting Minutes			
PX0471	NYU0002889	NYU0002891	6/1/2016	Marcia Wagner Depo		NYU Retirement Due Diligence Meeting			
PX0472	NYU0003083	NYU0003085	11/14/2011	Marcia Wagner Depo		NYU Retirement Plan Committee Meeting Minutes			
PX0473	NYU0003086	NYU0003089	5/15/2009	Nancy Sanchez Depo		NYU and NYU Langone Medical Center Due Diligence Meeting Notes			
PX0474	NYU0003275	NYU0003278	12/16/2015	Vanguard Rep		NYU Retirement Plan Due Diligence Meeting			
PX0475	NYU0003494	NYU0003496	9/15/2015	Patricia Halley Depo		NYU Retirement Committee Meeting Minutes			
PX0476	NYU0003671	NYU0003673	10/8/2008			NYU and NYU LMC Defined Contribution Investment Consulting Services Meeting Notes			
PX0477	NYU0003674	NYU0003677	1/10/2011	Vanguard Rep		NYU Retirement Plan Committee Meeting Minutes			
PX0478	NYU0003846	NYU0003848	1/31/2008	Nancy Sanchez Depo		NYU Retirement Committee Meeting Minutes			
PX0479	NYU0003948	NYU0003950	2/26/2015			NYU Retirement Committee Q4 2014 Due Diligence Meeting Notes			
PX0480	NYU0004040	NYU0004042	4/19/2010	Linda Woodruff Depo		NYU Retirement Plan Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0481	NYU0004047	NYU0004049	4/1/2011	Nancy Sanchez Depo		NYU Retirement Committee Meeting Minutes			
PX0482	NYU0004055	NYU0004058	5/17/2012	Marcia Wagner Depo		NYU Retirement Plan Committee Meeting Minutes			
PX0483	NYU0004345	NYU0004365	6/14/2010	(164-075)	Ex. 066	Cammack Supplemental Fiduciary Committee Information			
PX0484	NYU0005069	NYU0005072	9/15/2015	(164-085)	Ex. 076	NYU Retirement Committee Due Diligence Meeting			
PX0485	NYU0005074	NYU0005076	11/2/2010	Tina Suhr Depo	Exhibit 6	NYU Retirement Plan Committee Meeting Minutes			
PX0486	NYU0005498	NYU0005499	10/27/2015			NYU Cost Savings under TIAA-CREF			
PX0487	NYU0005468	NYU0005476	2/1/2011	Margaret Meagher Depo		NYU and NYU Langone Medical Center Retirement Plan Vendor Consolidation			
PX0488	NYU0005504	NYU0005504	6/30/2015			RS and TIAA Fee Reduction how fees are calculated and collected on investments in a TIAA account (Email to FBC 02-2013)			
PX0489	NYU0005489	NYU0005497	2/11/2013			Retirement Choice Plus Annuity Contract: CE-403259			
PX0490	NYU0005606	NYU0005631	9/15/2015			Vanguard: Delivering Value to Your Plan (NYU)			
PX0491	NYU0005632	NYU0005645	11/18/2015			vanguard Recordkeeping Fees email to Ann Kraus			
PX0492	NYU0005693	NYU0005695	7/23/2013			NYU Retirement Committee Meeting Notes			
PX0493	NYU0006119	NYU0006119				NYU Retirement Committee Meeting Minutes			
PX0494	NYU0006123	NYU0006124	1/21/2010			Vanguard All-in Fee Disclosure - NYU			
PX0495	NYU0006519	NYU0006543	3/31/2014			Vanguard All-in Fee Disclosure - NYU			
PX0496	NYU0007105	NYU0007127	3/31/2013			Vanguard All-in Fee Disclosure - NYU			
PX0497	NYU0007185	NYU0007217	8/25/2016			NYU Retirement Plans Fees and Credits			
PX0498	NYU0007218	NYU0007221	2/7/2013			Cammack NYU Fiduciary Due Diligence Report			
PX0499	NYU0007634	NYU0007690	6/30/2011	Tina Suhr Depo	Exhibit 34	Cammack Fiduciary Responsibility and Process Review			
PX0500	NYU0007827	NYU0007832	3/30/2011	(164-135)	Ex. 126				
PX0501	NYU0007871	NYU0007871	11/2/2010			Email Woodruff to Dorph, Casey, Surh, and Bing Re: Sole Record Keeper Decision Points	Incomplete per FRE 106. This document is part of a family of documents that that have been listed separately on the Exhibit List (PX0502).	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0502	NYU0007872	NYU0007874	11/2/2010			Attachment to NYU0007871: Talking points: The Advantages of Consolidating the 403(b) Program into a Single Vendor Arrangement Using TIAA-CREF	Incomplete per FRE 106. This document is part of a family of documents that have been listed separately on the Exhibit List (PX0501)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0503	NYU0009294	NYU0009294	1/6/2011	Tina Suhr Depo	Exhibit 12	Email Rezler to Meagher Re: NYU Ret Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have been listed separately on the Exhibit List (PX0504)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0504	NYU0009295	NYU0009302	1/1/2011	Tina Suhr Depo		Attachment to NYU0009294: Cammack NYU Retirement Plan Vendor Consolidation	Incomplete per FRE 106. This document is part of a family of documents that have been listed separately on the Exhibit List (PX0503)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0505	NYU0011076	NYU0011080	2/6/2013			Email re: NYU Retirement Plans Fees and "Excess Revenue" Credits - Attachments Faculty Benefits Committee and TIAA 403b Plan Questions, NYU Retirement Plans Fees and Credits			
PX0506	NYU0011354	NYU0011360	6/11/2013			Correspondence re: terms of Contract			
PX0507	NYU0012664	NYU0012780	12/31/2011			Attachment to NYU0012656: NYU and NYU LMC Fiduciary Due Diligence Report			
PX0508	NYU0012781	NYU0012854	12/31/2011			Attachment to NYU0012656: NYU LMC Fiduciary Due Diligence Report - Abridged Version			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0509	NYU0014483	NYU0014484	2/14/2014			NYU Business Payment Form and Cammack Invoice - Investment Advisor Fees			
PX0510	NYU0014485	NYU0014486	2/14/2014			NYU Business Payment Form and Cammack Invoice - Investment Advisor Fees			
PX0511	NYU0014487	NYU0014488	2/14/2014			NYU Business Payment Form and Cammack Invoice - Investment Advisor Fees			
PX0512	NYU0016344	NYU0016347	7/29/2013	Susanna Hollnsteiner Depo	Exhibit 7	Email Hollnsteiner to Rezier Re: June 2013 retirement committee minutes NYU Washington Square Vanguard Fund Lineup in NYU 403(b) Plans compared to NYU Medical Center and School of Medicine			
PX0513	NYU0019355	NYU0019355	12/9/2009			Woodruff email to Hollnsteiner re Agenda plus for Fri Ret Comm			
PX0514	NYU0025904	NYU0025905	3/28/2011	Linda Woodruff Depo		Re: New Outsourced Benefits Administrator PWC Audit 403(b) Plans May 2013			
PX0515	NYU0025918	NYU0025920	4/5/2011			Faculty Benefits Committee and TIAA 403b Plan Questions			
PX0516	NYU0026228	NYU0026229	5/14/2013			NYU, NYU School of Medicine, NYU Hospitals Center Retirement Plan Committee Charter			
PX0517	NYU0026244	NYU0026248	2/7/2013			NYU Retirement Plan Committee Meeting Minutes			
PX0518	NYU0026251	NYU0026255	1/1/2017	Nancy Sanchez Depo		NYU Retirement Plan Committee Meeting Minutes			
PX0519	NYU0026298	NYU0026300	12/12/2016	Susanna Hollnsteiner Depo	Exhibit 18	NYU - Executive Summary Plan Economics NYU Retirement Committee Meeting Minutes			
PX0520	NYU0026303	NYU0026306	9/8/2016	Susanna Hollnsteiner Depo	Exhibit 17	JPM TrusteeResignationLetter			
PX0521	NYU0026554	NYU0026557	2/5/2013			Vanguard - NYU: Partnership Report NYU_CostSavingsUnderTIAA-CREF_October2015			
PX0522	NYU0026645	NYU0026647	2/4/2009			Cammack RFP Results NYU Retirement Plan for Members of Faculty, Professional Research Staff and Administration DRAFT			
PX0523	NYU0026769	NYU0026769	7/23/2014			Cammack RFP and Plan Merger Timeline Cammack Supplemental Investment Information Cammack Fiduciary Due Diligence Report			
PX0524	NYU0027180	NYU0027181	2/1/2017			NYU and NYU Langone Medical Center Due Diligence Report			
PX0525	NYU0027750	NYU0027751	10/27/2015			Enhancements to NYU's Retirement Program (draft)			
PX0526	NYU0028134	NYU0028157	10/28/2009						
PX0527	NYU0028250	NYU0028296	1/1/2017						
PX0528	NYU0029676	NYU0029680	6/1/2016						
PX0529	NYU0030003	NYU0030057	6/30/2013						
PX0530	NYU0030499	NYU0030595	9/30/2012						
PX0531	NYU0030821	NYU0030899	3/31/2012	Nancy Sanchez Depo					
PX0532	NYU0031773	NYU0031774	10/1/2015	Lassaad Turki Depo	Exhibit 16				

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0533	NYU0034912	NYU0034921	5/1/2009	Nancy Sanchez Depo		Resolution of the Executive Committee of the Board of Trustees of NYU			
PX0534	NYU0035643	NYU0035656	6/9/2011			Investment Policy Statement For The Defined Contribution Retirement Plans of NYU, NYU LMC, and NYU Polytechnic - Approved working draft			
PX0535	NYU0035823	NYU0035833	11/2/2012			Letter to Plan Sponsors re: Consolidated Record Keeping Services			
PX0536	NYU0038184	NYU0038187	9/7/2016			Letter to Plan Sponsors re: Amendment #1 to Statement of Work			
PX0537	NYU0039392	NYU0039393	2/26/2015			Attachment to NYU0039390: Impact of TIAA-CREF Share Class Change on Excess Revenue			
PX0538	NYU0039522	NYU0039580	5/22/2014			Attachment to NYU0039421: NYU Retirement Committee Meeting Supplemental Investment Information			
PX0539	NYU0039679	NYU0039682	11/23/2016			Email re: Faculty Inquiries (Attachment - Retirement Plan to FBC)			
PX0540	NYU0048336	NYU0048340	6/8/2016			Email re: NYU Cammack Retirement Bi-weekly Status Meeting			
PX0541	NYU0052565	NYU0052567	2/1/2015			Important Information about an upcoming change to CREF			
PX0542	NYU0052982	NYU0052982	10/1/2014			Cammack Invoice - Investment Advisor Fees			
PX0543	NYU0054116	NYU0054116	9/15/2015			NYU Retirement Committee Meeting Agenda			
PX0544	NYU0054120	NYU0054200	9/15/2015			NYU LMC and NYU Polytechnic Institute Fiduciary Due Diligence Report			
PX0545	NYU0054201	NYU0054276	6/30/2015			NYU, NYU LMC, and NYU Polytechnic Supplemental Investment Information			
PX0546	NYU0064475	NYU0064967	2015-2009			Cammack Invoices from 2009-2015			
PX0547	NYU0082377	NYU0082377	2/26/2015			NYU Retirement Committee Meeting Agenda			
PX0548	NYU0082382	NYU0082462	12/31/2014			NYU, NYU LMC, and NYU Polytechnic Fiduciary Due Diligence Report			
PX0549	NYU0082463	NYU0082519	12/31/2014			NYU LMC and NYU Polytechnic Institute Supplemental Investment Information			
PX0550	NYU0082520	NYU0082521	10/1/2014			College Retirement Equities Fund (CREF) Multi-Class Summary: A new class structure beginning April 24, 2015			
PX0551	NYU0084551	NYU0084551	12/1/2012			Letter from NYU to Participant re: fee credit applied to accounts			
PX0552	NYU0084671	NYU0084679	7/19/2016			Letter to Plan Sponsors re: changes to Retirement Choice annuity contracts			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0553	NYU0084725	NYU0084728	2/18/2010			NYU Retirement Committee Meeting Minutes			
PX0554	NYU0085060	NYU0085064	10/9/2013			Resolution approving freeze of DC Retirement Plan and Incorporation of Plan-to-Plan Transfers Provisions from the Plan - Board of Trustees of Polytechnic Institute of NYU			
PX0555	NYU0086491	NYU0086499	6/14/2012			PwC Engagement Letter - Pensions (Executed)			
PX0556	NYU0087933	NYU0087938	9/15/2018			Scope of IA RFP Project			
PX0557	NYU0094062	NYU0094066	2/22/2013	Susanna Hollnsteiner Depo	Exhibit 16	NYU Retirement Plan Committee Meeting Minutes			
PX0558	NYU0094082	NYU0094086	1/18/2014			NYU School of Medicine and NYU Hospitals Center Retirement Plan Committee Charter (Amended)			
PX0559	NYU0094122	NYU0094126	3/18/2009	Linda Woodruff Depo	Exhibit 13	NYU Retirement Plan Committee Meeting Minutes			
PX0560	NYU0094173	NYU0094174	2/1/2017			Defined Contribution Retirement Plan RFP Finalist Presentation Sample Questions			
PX0561	NYU0094216	NYU0094220	5/17/2012	Susanna Hollnsteiner Depo	Exhibit 15	NYU Retirement Plan Committee Meeting Minutes			
PX0562	NYU0094227	NYU0094227		Linda Woodruff Depo		Clarifications for several items discussed at 3/18/10 meeting - Cammack's Questions and TIAA's responses			
PX0563	NYU0094245	NYU0094245	1/10/2011	Susanna Hollnsteiner Depo	Exhibit 11	Retirement Committee Jan 2011 agenda.docx	The description does not relate to the Bates range provided and the Bates range provided includes two documents that do not appear to be related.	Plaintiffs have revised the description to address Defendant's objection.	
PX0564	NYU0094259	NYU0094259	4/19/2010	Linda Woodruff Depo		NYU Retirement Plan Committee Meeting Minutes Agenda			
PX0565	NYU0094264	NYU0094265	7/14/2010			Retirement Committee Meeting Agenda			
PX0566	NYU0094272	NYU0094272		Linda Woodruff Depo		RFP Due Diligence Process - Next Steps			
PX0567	NYU0094276	NYU0094276	6/14/2010			NYU Retirement Committee Meeting Agenda			
PX0568	NYU0094330	NYU0094330	1/31/2008			NYU Retirement Committee Agenda			
PX0569	NYU0094336	NYU0094336	12/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0570	NYU0094339	NYU0094339	3/21/2011	Susanna Hollnsteiner Depo		Meeting Agenda			
PX0571	NYU0094347	NYU0094347	5/15/2009			NYU Retirement Committee Meeting Agenda			
PX0572	NYU0094628	NYU0094628	10/8/2008			NYU and NYU LMC Defined Contribution Investment Consulting Services Meeting Agenda			
PX0573	NYU0094677	NYU0094681	10/1/2016			NYU RFP Project: Follow up questions from RFP participants			
PX0574	NYU0095059	NYU0095065	3/21/2011			Investment Policy Statement (Draft)			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0575	NYU0095128	NYU0095134	6/9/2011			Investment Policy Statement For The Defined Contribution Retirement Plans of NYU, NYU LMC, and NYU Polytechnic - Approved working draft			
PX0576	NYU0095143	NYU0095144	10/1/2014			College Retirement Equities Fund (CREF) Multi-Class Summary: A new class structure beginning April 24, 2015			
PX0577	NYU0095202	NYU0095202	3/14/2016			Cammack Invoice - Investment Advisor Fees			
PX0578	NYU0095222	NYU0095222	1/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0579	NYU0095223	NYU0095223	3/20/2017			Cammack Invoice - Investment Advisor Fees			
PX0580	NYU0095224	NYU0095224	6/24/2016			Cammack Invoice - Investment Advisor Fees			
PX0581	NYU0095225	NYU0095225	2/25/2017			Cammack Invoice - Investment Advisor Fees			
PX0582	NYU0095244	NYU0095244	10/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0583	NYU0095246	NYU0095246	12/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0584	NYU0095247	NYU0095247	9/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0585	NYU0095248	NYU0095248	8/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0586	NYU0095249	NYU0095249	11/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0587	NYU0095251	NYU0095251	1/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0588	NYU0095252	NYU0095252	4/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0589	NYU0095259	NYU0095259	2/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0590	NYU0095260	NYU0095260	2/1/2016			Cammack Invoice - Investment Advisor Fees			
PX0591	NYU0095261	NYU0095261	3/2/2016			Cammack Invoice - Investment Advisor Fees			
PX0592	NYU0095262	NYU0095262	3/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0593	NYU0095263	NYU0095263	2/1/2015			Cammack Invoice - Investment Advisor Fees			
PX0594	NYU0095264	NYU0095264	12/1/2014			Cammack Invoice - Investment Advisor Fees			
PX0595	NYU0095265	NYU0095265	2/5/2014			Cammack Invoice - Investment Advisor Fees			
PX0596	NYU0095560	NYU0095560	8/1/2013			Cammack Invoice - Investment Advisor Fees			
PX0597	NYU0095703	NYU0095712	3/1/2015			NYU 403(b) Plan Merger Considerations			
PX0598	NYU0095952	NYU0095968	9/23/2010	Susanna Hollnsteiner Depo		Cammack NYU Vendor Consolidation			
PX0599	NYU0096264	NYU0096264	12/8/2016			Cammack Memo re RFP Process Overview	The Bates number range for this exhibit is incorrect. Accordingly, Defendant has not been able to identify it. Defendant reserves the right to object to this document.	Plaintiffs have revised the description to address Defendant's objection.	
PX0600	NYU0096380	NYU0096382	6/14/2010			NYU Retirement Committee Meeting Minutes			
PX0601	NYU0096385	NYU0096388	3/21/2011	Patricia Halley Depo		NYU Retirement Committee Meeting Minutes			

EXHIBIT 6

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0602	NYU0096592	NYU0096595	3/21/2011			403(b) Vendor Consolidation			
PX0603	NYU0096639	NYU0096657	12/31/2010	Nancy Sanchez Depo		NYU and NYU Langone Medical Center Executive Summary of Fiduciary Due Diligence Report			
PX0604	NYU0096791	NYU0096795	1/26/2011			NYU WS Vendor Change FAQs			
PX0605	NYU0096802	NYU0096808	1/7/2013			NYU Business Payment Form and Cammack Invoice - Investment Advisor Fees			
PX0606	NYU0096823	NYU0096829	3/31/2010			NYU and NYU LMC Addendum Watch List Funds			
PX0607	NYU0096837	NYU0096841	12/16/2009			TIAA RFP Presentation			
PX0608	NYU0096932	NYU0096989	9/25/2009			Fidelity RFP Response			
PX0609	NYU0097194	NYU0097210	7/14/2010			Vendor Consolidation			
PX0610	NYU0097267	NYU0097278	11/30/2010			NYU LMC Vendor Consolidation			
PX0611	NYU0097355	NYU0097372	3/18/2010	Linda Woodruff Depo		Cammack NYU TIAA-CREF RFP Updates			
PX0612	NYU0097457	NYU0097474	3/18/2010	Linda Woodruff Depo		Cammack NYU TIAA-CREF RFP Updates			
PX0613	NYU0098009	NYU0098018	2/18/2010			NYU Plan Sponsor Initiatives			
PX0614	NYU0098630	NYU0098632	6/14/2010			NYU Retirement Committee Meeting Minutes			
PX0615	NYU0098658	NYU0098669				Vanguard - Making Retirement Savings and Investing Easier			
PX0616	NYU0100381	NYU0100517	3/31/2011	Tina Suhr Depo	Exhibit 28	Cammack NYU Fiduciary Due Diligence Report			
PX0617	NYU0102304	NYU0102451	5/15/2009	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report			
PX0618	NYU0103685	NYU0103802	12/31/2010	Nancy Sanchez Depo		NYU and NYU Langone Medical Center Due Diligence Report			
PX0619	NYU0104039	NYU0104065	10/1/2016			Cammack - NYU Request for Proposal for Defined Contribution Recordkeeping Services			
PX0620	NYU0106042	NYU0106044	12/3/2008			Summary of Resolutions - Benefit Plan Board			
PX0621	NYU0106217	NYU0106217	12/3/2008			Approval of Changes to School of Medicine Benefit Plans - Compensation Committee of the Board of Trustees of NYU			
PX0622	NYU0106307	NYU0106307	1/1/2017			Election to Participate in the TIAA and CREF Group Retirement Trusts			
PX0623	NYU0106391	NYU0106392	1/7/2008			NYUSOM - Board Resolutions - 1- 7-2008			
PX0624	NYU0106473	NYU0106475	5/2/1994			Resolution - Board of Trustees of NYU re: Trustee's authority to amend/terminate the plan(s), as well as delgate it's authority to do so			
PX0625	NYU0108990	NYU0108992	2/17/2017			Letter to Sponsors re: Statement of Work and Fund Line-up Change with Mapping			
PX0626	NYU0109008	NYU0109026	10/14/2015	(164-037)		Letter re: Summary Plan Descriptions; Enhancements to NYU's Retirement Program			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0627	NYU0109343	NYU0109345	4/1/2011	Patricia Halley Depo		NYU Retirement Committee Meeting Minutes			
PX0628	NYU0109888	NYU0109899	6/9/2008			Overview & Background for NYU Retirement Committee Charter			
PX0629	NYU0111567	NYU0111567	2/1/2017			Defined Contribution Retirement Plan RFP Finalist Presentation Sample Questions			
PX0630	NYU0112654	NYU0112662	8/11/2016			Emails re: Investment Policy Statement			
PX0631	NYU0113763	NYU0113763	12/18/2013			Resolution approving of Amendments to NYU Retirement Plan Related to Merger of Polytechnic University - Board of Trustees of NYU			
PX0632	NYU0115166	NYU0115166	3/17/2015			FW: Long-term options for improving NYU retirement plan experience - draft	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0633	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0633	NYU0115167	NYU0115180	3/17/2015			Attachment to NYU0115166: Long-term options for improving NYU retirement plan experience-draft v1	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0632	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0634	NYU0118347	NYU0118348	11/8/2016			Letter to Plan Sponsors re: Amendment #2 to Statement of Work			
PX0635	NYU0120062	NYU0120067	7/20/2016			NYU SoM Application for CREF Retirement Choice Plus Annuity Contract			
PX0636	NYU0122579	NYU0122584	1/1/2012			NYU SoM 403(b) Retirement Plan Summary of Plan Services and Costs			
PX0637	NYU0122762	NYU0122763	3/1/2012			TIAA-CREF Understanding Plan Fees			
PX0638	NYU0128354	NYU0128354	9/9/2010			Appointment Reminder: TIAA-CREF/NYU Langone MC Conference Call			
PX0639	NYU0128363	NYU0128363	9/29/2010			Appointment Reminder: TIAA CALL			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0640	NYU0128408	NYU0128408	6/10/2011			Updated: NYU Langone Meeting Agenda			
PX0641	NYU0128412	NYU0128412	7/26/2011			Meeting at Tiaa Cref			
PX0642	NYU0128417	NYU0128417	7/26/2011			Appointment reminder: Hold for Annette and Ellen B			
PX0643	NYU0130132	NYU0130132	1/18/2011			Appointment Reminder: Comparison of committee charter			
PX0644	NYU0132556	NYU0132556	7/27/2011			Updated: NYULMC Communication and Education/ SRK review meeting			
PX0645	NYU0142355	NYU0142357	9/4/2012			Email - TIAA PROJECT: Week of 0/10/12 TO DO			
PX0646	NYU0151353	NYU0151355	6/23/2016			Letter to Plan Sponsors re: Statement of Work and Fund Line-up Change with Mapping			
PX0647	NYU0154358	NYU0154468	6/1/2016			NYU Retirement Committee Meeting Materials			
PX0648	NYU0154469	NYU0154548	6/1/2016			NYU LMC and NYU Polytechnic Institute and NYU Lutheran Medical Center Supplemental Investment Information			
PX0649	NYU0161052	NYU0161073	6/30/2015			NYU SoM Retirement Plan for Members of Faculty Professional Research Staff and Administration: Plan and Investment Notice			
PX0650	NYU0161158	NYU0161177	6/30/2013			NYU SoM 403(b) Retirement Plan Investment Options Comparative Chart			
PX0651	NYU0161178	NYU0161193	12/31/2011			NYU SoM 403(b) Retirement Plan Investment Options Comparative Chart			
PX0652	NYU0161209	NYU0161233	5/24/2012			Vanguard All-in Fee Disclosure - NYU SoM			
PX0653	NYU0161471	NYU0161495	3/31/2015			NYU Retirement Plan for Members of FAC, Prof Res Staff and Admin: Plan and Investment Notice			
PX0654	NYU0161618	NYU0161635	3/31/2014			NYU Retirement Plan Investment Options Comparative Chart			
PX0655	NYU0161636	NYU0161642	1/1/2014			NYU Retirement Plan Summary of Plan Services and Costs			
PX0656	NYU0161682	NYU0161699	3/31/2013			NYU Retirement Plan Investment Options Comparative Chart			
PX0657	NYU0161772	NYU0161789	12/31/2011	Lassaad Turki Depo	Exhibit 11	TIAA NYU Investment Options Comparative Chart			
PX0658	NYU0161790	NYU0161796	1/1/2012			NYU Retirement Plan Summary of Plan Services and Costs			
PX0659	NYU0161850	NYU0161855	12/9/2015			Resolution approving Amendment to Retirement Plan Committee Charter - Board of trustees of NYU			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0660	NYU0162332	NYU0162333	9/3/2014			Email Petti to Marrone Re: NYU/TW Secure site access	This document is incomplete per FRE 106. The exhibit lists the attachment to this email as a separate document. PX0661.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0661	NYU0162334	NYU0162350	9/2/2014			Attachment to NYU0162332: Towers Watson Project Kick-Off Meeting 403(b) Plan Contribution Review and Correction	This document is incomplete per FRE 106. The exhibit lists the attachment to this email as a separate document. PX0660.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0662	NYU0162846	NYU0162955	9/7/2017			NYU Retirement Committee Meeting Materials			
PX0663	NYU0162956	NYU0163027	9/7/2017			NYU LMC and NYU School of Medicine Supplemental Investment Information			
PX0664	NYU0164072	NYU0164088	2/18/2010			NYU Participant Initiatives			
PX0665	PLA-NYU-000135	PLA-NYU-000135	11/21/2012			Transfer of funds from Vanguard (SACERDOTE)			
PX0666	PLA-NYU-000136	PLA-NYU-000137	11/21/2012			Transfer of funds from Vanguard (SACERDOTE)			
PX0667	PLA-NYU-000138	PLA-NYU-000139	11/21/2012			Transfer of funds from Van Morg (SACERDOTE)			
PX0668	PLA-NYU-000140	PLA-NYU-000141	11/21/2012			Transfer of funds from Van Morg (SACERDOTE)			
PX0669	PLA-NYU-004141	PLA-NYU-004165	5/19/2009			Minutes, Resolutions and Retirement Plan Committee Charter - NYU Investment Committee and Operating Committee of the Board of Trustees of NYU Hospitals Center			
PX0670	TIAA_NYU_00000049	TIAA_NYU_00000054	12/31/2010			Letter to Plan Sponsor re: Service Fee and Disclosure Package			
PX0671	TIAA_NYU_00000055	TIAA_NYU_00000055	12/31/2012			NYU SoM Direct Fees Paid from Plan Assets			
PX0672	TIAA_NYU_00000056	TIAA_NYU_00000059	12/31/2012			NYU SoM Investment Fee & Expense Disclosure			
PX0673	TIAA_NYU_00000060	TIAA_NYU_00000066	12/31/2012			NYU SoM Service Provider Summary			
PX0674	TIAA_NYU_00000067	TIAA_NYU_00000067	12/31/2012			NYU SoM Summary of Fees and Comensation for Your Plan			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0675	TIAA_NYU_00000068	TIAA_NYU_00000068	12/31/2013	Doug Chittenden Depo	Exhibit 8	NYU SoM Direct Fees Paid from Plan Assets			
PX0676	TIAA_NYU_00000069	TIAA_NYU_00000073	1/1/2013			TIAA Investment Fee & Expense Disclosure			
PX0677	TIAA_NYU_00000074	TIAA_NYU_00000080	12/31/2013			NYU SoM Service Provider Summary			
PX0678	TIAA_NYU_00000081	TIAA_NYU_00000081	12/31/2013			NYU SoM - Summary of Fees and Compensation for Your Plan TIAA-CREF			
PX0679	TIAA_NYU_00000082	TIAA_NYU_00000082	12/31/2014			NYU SoM Direct Fees Paid from Plan Assets			
PX0680	TIAA_NYU_00000083	TIAA_NYU_00000087	12/31/2014			NYU SoM Investment Fee & Expense Disclosure			
PX0681	TIAA_NYU_00000088	TIAA_NYU_00000094	12/31/2014			NYU SoM Service Provider Summary			
PX0682	TIAA_NYU_00000095	TIAA_NYU_00000095	12/31/2014			NYU SoM Summary of Fees and Comensation for Your Plan			
PX0683	TIAA_NYU_00000106	TIAA_NYU_00000106	12/31/2015			NYU SoM Direct Fees Paid from Plan Assets			
PX0684	TIAA_NYU_00000107	TIAA_NYU_00000111	12/31/2015			NYU SoM Investment Fee & Expense Disclosure			
PX0685	TIAA_NYU_00000112	TIAA_NYU_00000119	12/31/2015			NYU SoM Service Provider Summary			
PX0686	TIAA_NYU_00000120	TIAA_NYU_00000120	12/31/2015			NYU SoM Summary of Fees and Comensation for Your Plan			
PX0687	TIAA_NYU_00000121	TIAA_NYU_00000121	12/31/2016			NYU SoM Direct Fees Paid from Plan Assets			
PX0688	TIAA_NYU_00000122	TIAA_NYU_00000125	12/31/2016			NYU SoM Investment Fee & Expense Disclosure			
PX0689	TIAA_NYU_00000126	TIAA_NYU_00000133	12/31/2016			NYU SoM Service Provider Summary			
PX0690	TIAA_NYU_00000134	TIAA_NYU_00000134	12/31/2016			NYU SoM Summary of Fees and Comensation for Your Plan			
PX0691	TIAA_NYU_00000209	TIAA_NYU_00000209	1/1/2010	Doug Chittenden Depo	Exhibit 4	TIAA Direct Fees Paid from Plan Assets			
PX0692	TIAA_NYU_00000213	TIAA_NYU_00000214	1/1/2010	Doug Chittenden Depo	Exhibit 5	TIAA Investment Fee & Expense Disclosure			
PX0693	TIAA_NYU_00000244	TIAA_NYU_00000246	12/31/2010	Doug Chittenden Depo	Exhibit 7	NYU Service Provider Summary			
PX0694	TIAA_NYU_00000254	TIAA_NYU_00000254	1/1/2010			TIAA Summary of Fees and Compensation for your Plan			
PX0695	TIAA_NYU_00000847	TIAA_NYU_00000847	12/31/2011			NYU Direct Fees Paid from Plan Assets			
PX0696	TIAA_NYU_00000869	TIAA_NYU_00000870	12/31/2011			NYU Investment Fee & Expense Disclosure			
PX0697	TIAA_NYU_00000902	TIAA_NYU_00000904	12/31/2011			NYU Service Provider Summary			
PX0698	TIAA_NYU_00000912	TIAA_NYU_00000912	12/31/2011			NYU Summary of Fees and Compensation for Your Plan			
PX0699	TIAA_NYU_00001572	TIAA_NYU_00001572	12/31/2012			NYU Direct Fees Paid from Plan Assets			
PX0700	TIAA_NYU_00001578	TIAA_NYU_00001579	12/31/2012			NYU Investment Fee & Expense Disclosure			
PX0701	TIAA_NYU_00001612	TIAA_NYU_00001615	12/31/2012			NYU Service Provider Summary			
PX0702	TIAA_NYU_00001627	TIAA_NYU_00001627	12/31/2012			NYU Summary of Fees and Compensation for Your Plan			
PX0703	TIAA_NYU_00002304	TIAA_NYU_00002304	12/31/2013			NYU Direct Fees Paid from Plan Assets			
PX0704	TIAA_NYU_00002308	TIAA_NYU_00002309	12/31/2013			NYU Investment Fee & Expense Disclosure			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0705	TIAA_NYU_00002337	TIAA_NYU_00002337	12/31/2013			Revenue Credit Account Report			
PX0706	TIAA_NYU_00002345	TIAA_NYU_00002347	12/31/2013			NYU Service Provider Summary			
PX0707	TIAA_NYU_00002355	TIAA_NYU_00002355	12/31/2013			NYU Summary of Fees and Compensation for Your Plan			
PX0708	TIAA_NYU_00003085	TIAA_NYU_00003085	12/31/2014			NYU Direct Fees Paid from Plan Assets			
PX0709	TIAA_NYU_00003096	TIAA_NYU_00003097	12/31/2014			NYU Investment Fee & Expense Disclosure			
PX0710	TIAA_NYU_00003131	TIAA_NYU_00003131	12/31/2014			Revenue Credit Account Report			
PX0711	TIAA_NYU_00003139	TIAA_NYU_00003141	12/31/2014			NYU Service Provider Summary			
PX0712	TIAA_NYU_00003149	TIAA_NYU_00003149	12/31/2014			NYU Summary of Fees and Compensation for Your Plan			
PX0713	TIAA_NYU_00003942	TIAA_NYU_00003943	12/31/2015			NYU Investment Fee & Expense Disclosure			
PX0714	TIAA_NYU_00003977	TIAA_NYU_00003977	12/31/2015			Revenue Credit Account Report			
PX0715	TIAA_NYU_00003985	TIAA_NYU_00003987	12/31/2015			NYU Service Provider Summary			
PX0716	TIAA_NYU_00003997	TIAA_NYU_00003997	12/31/2015			NYU Summary of Fees and Compensation for Your Plan			
PX0717	TIAA_NYU_00004761	TIAA_NYU_00004761	12/31/2016			NYU Direct Fees Paid from Plan Assets			
PX0718	TIAA_NYU_00004772	TIAA_NYU_00004773	12/31/2016			NYU Investment Fee & Expense Disclosure			
PX0719	TIAA_NYU_00004811	TIAA_NYU_00004811	12/31/2016			Revenue Credit Account Report			
PX0720	TIAA_NYU_00004819	TIAA_NYU_00004821	12/31/2016			NYU Service Provider Summary			
PX0721	TIAA_NYU_00004830	TIAA_NYU_00004830	12/31/2016			NYU Summary of Fees and Compensation for Your Plan			
PX0722	TIAA_NYU_00007226	TIAA_NYU_00007226	12/31/2013			NYU SoM Direct Fees Paid from Plan Assets			
PX0723	TIAA_NYU_00007275	TIAA_NYU_00007275	12/31/2013			Revenue Credit Account Report			
PX0724	TIAA_NYU_00008458	TIAA_NYU_00008458	12/31/2014			Revenue Credit Account Report			
PX0725	TIAA_NYU_00009715	TIAA_NYU_00009715	12/31/2015			Revenue Credit Account Report			
PX0726	TIAA_NYU_00011132	TIAA_NYU_00011132	12/31/2016			Revenue Credit Account Report			
PX0727	TIAA_NYU_00013752	TIAA_NYU_00013877				TIAA Supplemental Retirement Annuity Contract (to participant BROWN)			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0728	TIAA_NYU_00013878	TIAA_NYU_00013983				TIAA Group Retirement Annuity Certificate (to participant MONACO)			
PX0729	TIAA_NYU_00013984	TIAA_NYU_00014033				TIAA Retirement Annuity Contract (to participant MONACO)			
PX0730	TIAA_NYU_00014034	TIAA_NYU_00014167				TIAA Retirement Annuity Contract (to participant MONACO)			
PX0731	TIAA_NYU_00014168	TIAA_NYU_00014287				TIAA Retirement Annuity Contract (to participant MONACO)			
PX0732	TIAA_NYU_00014288	TIAA_NYU_00014335				TIAA Supplemental Retirement Annuity Contract (to participant MONACO)			
PX0733	TIAA_NYU_00014336	TIAA_NYU_00014435				TIAA Group Supplemental Retirement Annuity Certificate (to participant MONACO)			
PX0734	TIAA_NYU_00014439	TIAA_NYU_00014544				TIAA Group Retirement Annuity Certificate (to participant SACERDOTE)			
PX0735	TIAA_NYU_00014545	TIAA_NYU_00014644				TIAA Group Supplemental Retirement Annuity Certificate (to participant SACERDOTE)			
PX0736	TIAA_NYU_00014645	TIAA_NYU_00014750				TIAA Group Retirement Annuity Certificate (to participant SAMUELS)			
PX0737	TIAA_NYU_00014751	TIAA_NYU_00014870				TIAA Retirement Annuity Contract (to participant SAMUELS)			
PX0738	TIAA_NYU_00014871	TIAA_NYU_00014982				TIAA Group Supplemental Retirement Annuity Certificate (to participant SAMUELS)			
PX0739	TIAA_NYU_00015002	TIAA_NYU_00015041				TIAA Retirement Annuity Contract (to participant STRAUSSNER)			
PX0740	TIAA_NYU_00015042	TIAA_NYU_00015159				TIAA Retirement Annuity Contract (to participant STRAUSSNER)			
PX0741	TIAA_NYU_00015160	TIAA_NYU_00015191				TIAA Transfer Payout Annuity (to participant STRAUSSNER)			
PX0742	TIAA_NYU_00015224	TIAA_NYU_00015323				TIAA Group Supplemental Retirement Annuity Certificate (to participant STRAUSSNER)			
PX0743	TIAA_NYU_00015338	TIAA_NYU_00015345		Lassaad Turki Depo	Exhibit 5	TIAA Dear Plan Sponsor: Service & Fee Disclosure Package			
PX0744	TIAA_NYU_00015376	TIAA_NYU_00015376	12/31/2015			NYU Direct Fees Paid from Plan Assets			
PX0745	TIAA_NYU_00015392	TIAA_NYU_00015393	12/1/2014			TIAA-CREF Service & Fee Disclosure Change Notice			
PX0746	TIAA_NYU_00015716	TIAA_NYU_00015716	12/31/2011			NYU SoM Direct Fees Paid from Plan Assets			
PX0747	TIAA_NYU_00015726	TIAA_NYU_00015727	12/31/2011			NYU SoM Investment Fee & Expense Disclosure			
PX0748	TIAA_NYU_00015750	TIAA_NYU_00015751	12/31/2011			NYU SoM Service Provider Summary			
PX0749	TIAA_NYU_00015756	TIAA_NYU_00015756	12/31/2011			NYU SoM Summary of Fees and Comensation for Your Plan			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0750	TIAA_NYU_00016187	TIAA_NYU_00016187	12/31/2010			NYU SoM Direct Fees Paid from Plan Assets			
PX0751	TIAA_NYU_00016191	TIAA_NYU_00016191	12/31/2010			NYU SoM Investment Fee & Expense Disclosure			
PX0752	TIAA_NYU_00016220	TIAA_NYU_00016221	12/31/2010			NYU SoM Service Provider Summary			
PX0753	TIAA_NYU_00016225	TIAA_NYU_00016225	12/31/2010			NYU SoM Summary of Fees and Comensation for Your Plan			
PX0754	TIAA_NYU_00016892	TIAA_NYU_00016892	12/31/2009			NYU Direct Fees Paid from Plan Assets			
PX0755	TIAA_NYU_00016896	TIAA_NYU_00016897	12/31/2009			NYU Investment Fee & Expense Disclosure			
PX0756	TIAA_NYU_00016925	TIAA_NYU_00016927	12/31/2009			NYU Service Provider Summary			
PX0757	TIAA_NYU_00016935	TIAA_NYU_00016935	12/31/2009			NYU Summary of Fees and Compensation for Your Plan			
PX0758	TIAA_NYU_00017433	TIAA_NYU_00017433	12/31/2009			NYU SoM Direct Fees Paid from Plan Assets			
PX0759	TIAA_NYU_00017438	TIAA_NYU_00017439	12/31/2009			NYU SoM Investment Fee & Expense Disclosure			
PX0760	TIAA_NYU_00017462	TIAA_NYU_00017463	12/31/2009			NYU SoM Service Provider Summary			
PX0761	TIAA_NYU_00017467	TIAA_NYU_00017467	12/31/2009			NYU SoM Summary of Fees and Comensation for Your Plan			
PX0762	TIAA_NYU_00017874	TIAA_NYU_00017880	7/1/2014			NYU Retirement Plan Summary of Plan Services and Costs			
PX0763	TIAA_NYU_00017881	TIAA_NYU_00017887	6/18/2013			NYU Retirement Plan Summary of Plan Services and Costs			
PX0764	TIAA_NYU_00020056	TIAA_NYU_00020059	2/1/2013			Email re: Updated Revenue Credit Letter			
PX0765	TIAA_NYU_00021564	TIAA_NYU_00021581	2/5/2013			Email re: Explanation of the Return of Excess Plan Expense ("Revenue Credits") - Attachments: Executive Summary Plan Economics, Reasonableness of Fees			
PX0766	TIAA_NYU_00021732	TIAA_NYU_00021733	4/3/2014	(164-127)	Ex. 118	Email from Hollnsteiner to Brown re Workday's PeopleSync			
PX0767	TIAA_NYU_00022334	TIAA_NYU_00022335	2/23/2010			Re: TIAA - Thank you for the meeting and information on 5500 service pricing			
PX0768	TIAA_NYU_00022741	TIAA_NYU_00022741	6/2/2010			RE: Questions about Retirement Plans			
PX0769	TIAA_NYU_00023889	TIAA_NYU_00023889	6/22/2011			RE: NYU - TIAA Traditional Annuity Support Request			
PX0770	TIAA_NYU_00023946	TIAA_NYU_00023952	7/7/2011			FW: NYU Washington Square/Langone Data Request			
PX0771	TIAA_NYU_00028065	TIAA_NYU_00028089	3/31/2016			NYU Retirement Plan for Members of FAC, Prof Res Staff and Admin: Plan and Investment Notice			
PX0772	TIAA_NYU_00028442	TIAA_NYU_00028443	2/10/2010			RE: NYU RFP meeting Attachment to			
PX0773	TIAA_NYU_00028444	TIAA_NYU_00028451	2/10/2010			TIAA_NYU_00028442: TIAA-CREF Response to NYU Additional Questions			
PX0774	TIAA_NYU_00028456	TIAA_NYU_00028457	11/10/2010			tiaa-cref Pricing Follow-Up for NYU			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0775	TIAA_NYU_00028750	TIAA_NYU_00028750	10/26/2011			RE: Pricing RE: TIAA-CREF NYU Response + Sample Retirement Choice Contacts   Applications   Record Keeping Agreement RE: NYU			
PX0776	TIAA_NYU_00028844	TIAA_NYU_00028845	1/22/2010			Attachment to TIAA_NYU_0028942: SV_TIAA_SV_Suite_RC_RCP_TSV			
PX0777	TIAA_NYU_00028942	TIAA_NYU_00028943	3/11/2010			Email - NYU RE: NYU TIAA Letter re Important information about your retirement plan TIAA Cref RFP			
PX0778	TIAA_NYU_00028944	TIAA_NYU_00028949	3/11/2010			Email - NYU- additional request			
PX0779	TIAA_NYU_00028953	TIAA_NYU_00028954	3/29/2010			RE: NYU- additional request NYU RFP			
PX0780	TIAA_NYU_00028964	TIAA_NYU_00028967	3/29/2010			Email - SECURE: NYU plan merge - TIAA-CREF response Attachment to TIAA_NYU_00032141: SV_Comparison3 Attachment to TIAA_NYU_00032141: Ret Choice CREF contract CIGRS- 01withSECendSample			
PX0781	TIAA_NYU_00030743	TIAA_NYU_00030768	5/3/2017	Marcia Wagner Depo	Exhibit 7	Attachment to TIAA_NYU_00032141: Ret Choice TIAA contract IGRS-01-84- ACCSAMPLE			
PX0782	TIAA_NYU_00031997	TIAA_NYU_00031997	6/30/2009			Attachment to TIAA_NYU_00032141: New OPS File Format Specification			
PX0783	TIAA_NYU_00032026	TIAA_NYU_00032026	10/20/2009			Letter re: The Merger of the NYU Tax Deferred Annuity Plan 102193 in to the Nyu Retirement Plan 102192			
PX0784	TIAA_NYU_00032027	TIAA_NYU_00032028	10/20/2009			Attachment to TIAA_NYU_00032371: Alloc Srce Remd Ltr - Phs 2 PreNot			
PX0785	TIAA_NYU_00032030	TIAA_NYU_00032030	11/6/2009			Email - SECUREWEB: Allocation Corrections TIAA-CREF			
PX0786	TIAA_NYU_00032141	TIAA_NYU_00032143	8/26/2009			Attachment to TIAA_NYU_00032371: Allocation Sourc ePhas 2 confirm (2)			
PX0787	TIAA_NYU_00032144	TIAA_NYU_00032149	8/19/2009			NYU SoM Retirement Plan for Members of Faculty Professional Research Staff and Administration: Plan and Investment Notice			
PX0788	TIAA_NYU_00032150	TIAA_NYU_00032167	6/10/2009			NYU Langone Medical Center / TIAA-CREF - Recap of Meeting			
PX0789	TIAA_NYU_00032168	TIAA_NYU_00032195	6/10/2009			Email from Conmy to Sanchez re TIAA-CREF Revenue Credit			
PX0790	TIAA_NYU_00032196	TIAA_NYU_00032285	8/26/2009			TIAA Letter re Consolidating Recordkeeping Quarterly Statement			
PX0791	TIAA_NYU_00032289	TIAA_NYU_00032291	9/21/2009						
PX0792	TIAA_NYU_00032375	TIAA_NYU_00032375	10/13/2009						
PX0793	TIAA_NYU_00032371	TIAA_NYU_00032373	10/19/2009						
PX0794	TIAA_NYU_00032374	TIAA_NYU_00032374	10/19/2009						
PX0795	TIAA_NYU_00034395	TIAA_NYU_00034416	3/31/2015						
PX0796	TIAA_NYU_00038042	TIAA_NYU_00038043	1/29/2010						
PX0797	TIAA_NYU_00038066	TIAA_NYU_00038070	12/24/2012						
PX0798	TIAA_NYU_00038071	TIAA_NYU_00038072	12/24/2012						
PX0799	TIAA_NYU_00038075	TIAA_NYU_00038082	12/24/2012						

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0800	TIAA_NYU_00038083	TIAA_NYU_00038084	12/24/2012			TIAA Confirmation Statement			
PX0801	TIAA_NYU_00038232	TIAA_NYU_00038232	9/23/2010			Email - Last minute question			
PX0802	TIAA_NYU_00038447	TIAA_NYU_00038447	11/11/2010			TIAA Invoice - Form 500 Preparation Service Fee			
PX0803	TIAA_NYU_00038461	TIAA_NYU_00038463	5/18/2010			Re: TIAA-CREF: additional reduction of CREF expenses			
PX0804	TIAA_NYU_00038473	TIAA_NYU_00038473	5/21/2010			RE: Q for you			
PX0805	TIAA_NYU_00038474	TIAA_NYU_00038474	5/21/2010			Attachment to TIAA_NYU_00038473: tiaa sample notice			
PX0806	TIAA_NYU_00038484	TIAA_NYU_00038484	6/3/2010			DOL - ERISA Fiduciary Responsibilities Webinars			
PX0807	TIAA_NYU_00038634	TIAA_NYU_00038635	2/10/2011			FW: Reports			
PX0808	TIAA_NYU_00038638	TIAA_NYU_00038639	3/15/2011			RE: Client Forum			
PX0809	TIAA_NYU_00038640	TIAA_NYU_00038641	3/21/2011			RE: call me for the good news			
PX0810	TIAA_NYU_00038642	TIAA_NYU_00038643	3/21/2011			Attachment to TIAA_NYU_00038640: rhp_admin_fs_final_c47391_032610			
PX0811	TIAA_NYU_00038644	TIAA_NYU_00038655	3/21/2011			Attachment to TIAA_NYU_00038640: rhp_admin_bro_final_c47352_32510			
PX0812	TIAA_NYU_00038656	TIAA_NYU_00038671	3/21/2011			Attachment to TIAA_NYU_00038640: Retirement_HCA_Brochure			
PX0813	TIAA_NYU_00038679	TIAA_NYU_00038679	6/15/2011			Email - Vesting Forfeitures			
PX0814	TIAA_NYU_00038681	TIAA_NYU_00038681	6/16/2011			FW: Vesting forfeitures			
PX0815	TIAA_NYU_00038684	TIAA_NYU_00038685	6/16/2011	Margaret Meagher Depo		Email from D. Conmy at TIAA to M. Meagher regarding Vesting Forfeitures			
PX0816	TIAA_NYU_00038692	TIAA_NYU_00038692	7/10/2011			High level syncing of project timelines			
PX0817	TIAA_NYU_00038704	TIAA_NYU_00038704	8/2/2011			NYULMC Communication and Education/ SRK Review Meeting - August 2, 2011			
PX0818	TIAA_NYU_00038705	TIAA_NYU_00038705	8/2/2011			Attachment to TIAA_NYU_00038704: NYU Langone 8-2 Marketing Client Meeting Agenda			
PX0819	TIAA_NYU_00038711	TIAA_NYU_00038713	8/5/2011			NYULMC Communication and Education/ SRK Review Meeting - August 2, 2011			
PX0820	TIAA_NYU_00038762	TIAA_NYU_00038762	10/10/2011			Email - NYU Langone - NYU School of Medicine & NYU Hospitals Center & RHP Update on 10/11/11			
PX0821	TIAA_NYU_00038857	TIAA_NYU_00038858	10/31/2011			RE: Just wondering when the contracts package will be sent out			
PX0822	TIAA_NYU_00040111	TIAA_NYU_00040111	9/17/2012			Email - Need your help			
PX0823	TIAA_NYU_00040955	TIAA_NYU_00040965	12/31/2012			Email Conmy to Sanchez Re: TIAA-CREF Revenue Credit Letter	Bates numbers are wrong. Accordingly, this document could not be identified. Defendant reserves the right to object to this document.	Plaintiffs have revised the description to address Defendant's objection.	
PX0824	TIAA_NYU_00040986	TIAA_NYU_00040995	12/31/2012			Email from Conmy to Sanchez re TIAA-CREF Revenue Credit Letter			
PX0825	TIAA_NYU_00041605	TIAA_NYU_00041606	3/25/2010			RE: Proposed date to meet about 500 services			
PX0826	TIAA_NYU_00041649	TIAA_NYU_00041650	5/5/2010			RE: TIAA			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0827	TIAA_NYU_00044715	TIAA_NYU_00044724	12/31/2011	Daniel Fischel Depo		NYU School of Medicine Investment Options Comparative Chart Email from Ryan to Meagher re Notification for new G/SRA Contracts TIAA Custodial Account Agreement for a 403(b) Plan			
PX0828	TIAA_NYU_00046382	TIAA_NYU_00046387	6/11/2012						
PX0829	NYU0000597	NYU0000610	10/4/2012						
PX0829	TIAA_NYU_00049009	TIAA_NYU_00049010	11/2/2015			Custodial Account Agreement - Revised Appendix A			
PX0829	NYU0157318	NYU0157320	8/22/2016			Custodial Account Agreement - Revised Appendix A			
PX0830	TIAA_NYU_00054884	TIAA_NYU_00054887	2/11/2010			Fw: New TIAA stable value account Email from M. Meagher to P. Hueber re issues related to client moves, SRK			
PX0831	TIAA_NYU_00054957	TIAA_NYU_00054958	5/12/2010	Margaret Meagher Depo	Exhibit 1	Re: Foreign address mutual fund problem RE: Foreign Participant Issue RE: Last minute question RE: NYU RE: SR enrollment TIAA Real Estate Information			
PX0832	TIAA_NYU_00054969	TIAA_NYU_00054971	6/20/2010			Attachment to TIAA_NYU_00055254: REA FAQ			
PX0833	TIAA_NYU_00054985	TIAA_NYU_00054988	6/24/2010			Attachment to TIAA_NYU_00055254: REA 4Q 10 FINA			
PX0834	TIAA_NYU_00055051	TIAA_NYU_00055051	9/23/2010			Attachment to TIAA_NYU_00055254: Q4 10 Comprehensive Account and Fund Commentary Retirement3			
PX0835	TIAA_NYU_00055243	TIAA_NYU_00055249	3/27/2011						
PX0836	TIAA_NYU_00055250	TIAA_NYU_00055250	3/31/2011						
PX0837	TIAA_NYU_00055254	TIAA_NYU_00055254	3/28/2011						
PX0838	TIAA_NYU_00055255	TIAA_NYU_00055276	3/28/2011						
PX0839	TIAA_NYU_00055277	TIAA_NYU_00055280	12/31/2010						
PX0840	TIAA_NYU_00055281	TIAA_NYU_00055308	12/31/2010						
PX0841	TIAA_NYU_00055317	TIAA_NYU_00055317	4/27/2011			TIAA-CREF Meeting Follow-Up			
PX0842	TIAA_NYU_00056900	TIAA_NYU_00056901	8/26/2009	Margaret Meagher Depo		Email from P. Hueber to M. Meagher regarding TIAA RFP Email - Fun Fact			
PX0843	TIAA_NYU_00056907	TIAA_NYU_00056907	9/24/2009			NYU, NYU SoM, NYUHC, and NYU POLY Defined Contribution Retirement Programs			
PX0844	TIAA_NYU_00056916	TIAA_NYU_00057319	9/1/2009						
PX0845	TIAA_NYU_00057399	TIAA_NYU_00057400	11/13/2009	Margaret Meagher Depo	Exhibit 5	Email Meagher to Hueber Re: RFP and TIAA facing some skeptics Email Hueber to Meagher Re: NYU Retirement Plan Attachment to TIAA_NYU_0057405: C4619_caltechrel_FINAL (2) RE: NYU			
PX0846	TIAA_NYU_00057405	TIAA_NYU_00057405	12/4/2009						
PX0847	TIAA_NYU_00057406	TIAA_NYU_00057407	12/7/2009						
PX0848	TIAA_NYU_00059364	TIAA_NYU_00059366	3/12/2010						
PX0849	TIAA_NYU_00059373	TIAA_NYU_00059375	6/24/2010			RE: NYU Foreign Contract Issue			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0850	TIAA_NYU_00059436	TIAA_NYU_00059437	2/25/2011			Email -NYU Concept Document	Document is incomplete per FRE 106. The exhibit lists its attachment as a separate document, PX0851.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0851	TIAA_NYU_00059438	TIAA_NYU_00059468	2/25/2011			Attachment to TIAA_NYU_00059436: NYU_Plan Changes Proposal DRAFT	Document is incomplete per FRE 106. The exhibit lists its attachment as a separate document, PX0850.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0852	TIAA_NYU_00064514	TIAA_NYU_00064514	12/31/2012			NYU Retirement Plan(s) Assets/Revenue (July - December)			
PX0853	TIAA_NYU_00064515	TIAA_NYU_00064518				Revenue Credit			
PX0854	TIAA_NYU_00064519	TIAA_NYU_00064519				NYU Retirement Plan(s) Assets/Revenue (July - December)			
PX0855	TIAA_NYU_00064526	TIAA_NYU_00064526				NYU Retirement Plan(s) Assets/Revenue (January - June)			
PX0856	TIAA_NYU_00064531	TIAA_NYU_00064531				NYU Retirement Plan(s) Assets/Revenue (July - December)			
PX0857	TIAA_NYU_00064536	TIAA_NYU_00064536				NYU Retirement Plan(s) Assets/Revenue (January - June)			
PX0858	TIAA_NYU_00064541	TIAA_NYU_00064541				NYU Retirement Plan(s) Assets/Revenue (July - December)			
PX0859	TIAA_NYU_00064547	TIAA_NYU_00064547				NYU Retirement Plan(s) Assets/Revenue (January - June)			
PX0860	TIAA_NYU_00065389	TIAA_NYU_00065451	1/15/2010			TIAA RFP Follow Up Qs			
PX0861	TIAA_NYU_00065452	TIAA_NYU_00065454	12/31/2009			TIAA Real Estate Account Portfolio			
PX0862	TIAA_NYU_00065503	TIAA_NYU_00065505	6/30/2017			NYU Plan Economics Reconciliation Report TIAA-CREF			
PX0863	TIAA_NYU_00065525	TIAA_NYU_00065542	1/1/2017	Lassaad Turki Depo	Exhibit 8	TIAA Plan Economics Reconciliation Report for NYU School of Medicine			
PX0864	TIAA_NYU_00065537	TIAA_NYU_00065542	9/30/2017			NYU SoM: Plan Economics Reconciliation Report TIAA			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0865	TIAA_NYU_00065573	TIAA_NYU_00065573				NYU School of Medicine Retirement Plan(s) Assets/Revenue (January - June)			
PX0866	TIAA_NYU_00081597	TIAA_NYU_00081624	10/27/2011			TIAA Real Estate Account 8-k			
PX0867	TIAA_NYU_00081731	TIAA_NYU_00081757	10/14/2014	(164-101)	Ex. 092	TIAA Real Estate Account 8-k			
PX0868	TIAA_NYU_00082038	TIAA_NYU_00082051	8/15/2012			TIAA Real Estate Account 8-k			
PX0869	TIAA_NYU_00082333	TIAA_NYU_00082338		Doug Chittenden Depo		TIAA and CREF contract comparison			
PX0870	TIAA_NYU_00082339	TIAA_NYU_00082342	3/31/2017			TIAA and CREF contract comparison			
PX0871	TIAA_NYU_00082343	TIAA_NYU_00082347	3/31/2017			TIAA and CREF contract comparison			
PX0872	TIAA_NYU_00082348	TIAA_NYU_00082351	3/31/2017			TIAA and CREF contract comparison			
PX0873	TIAA_NYU_00082352	TIAA_NYU_00082355	3/31/2017			TIAA and CREF contract comparison			
PX0874	TIAA_NYU_00082356	TIAA_NYU_00082357				Retirement Choice Annuities: Implementing new annuity contracts in your retirement program			
PX0875	TIAA_NYU_00082574	TIAA_NYU_00082583	8/20/2014	Doug Chittenden Depo	Exhibit 15	NYU School of Medicine Revenue Credit			
PX0876	TIAA_NYU_00082638	TIAA_NYU_00082659	6/30/2016			NYU SoM Retirement Plan for Members of Faculty Professional Research Staff and Administration: Plan and Investment Notice			
PX0877	TIAA_NYU_00082779	TIAA_NYU_00082799	6/30/2013			NYU SoM Retirement Plan for Members of Faculty Professional Research Staff and Administration: Plan and Investment Notice			
PX0878	TIAA_NYU_00083385	TIAA_NYU_00083385	9/8/2016	Doug Chittenden Depo	Exhibit 14	TIAA Revenue Credit Account			
PX0879	TIAA_NYU_00083468	TIAA_NYU_00083493	12/6/2012			Plan Servicing Credits for Participants			
PX0880	TIAA_NYU_00083604	TIAA_NYU_00083687	12/16/2009	Peter Hueber Depo	Exhibit 19	Cammack and TIAA: Partnering for Success			
PX0881	TIAA_NYU_00083950	TIAA_NYU_00083980	12/16/2009	Peter Hueber Depo	Exhibit 20	Cammack - The New World of 403(b): Audits, Filing and Regulatory Compliance			
PX0882	TIAA_NYU_00084217	TIAA_NYU_00084384	8/22/2017			TIAA Retirement Plan Presentation to NYU			
PX0883	TIAA_NYU_00084575	TIAA_NYU_00084577	4/1/2009			Call log	Document description does not match the Bates range ; provided. Document contains hearsay. FRE 801-802.	Bates range is correct as it was produced to Plaintiffs. PX0882 contains records of a regularly conducted activity that will be confirmed by a live witness at trial.	
PX0884	TIAA_NYU_00084896	TIAA_NYU_00084911	8/29/2017			Letter to Participants re: NYU Hospital & Participating Employers and NYU School of Medicine - Plan Consolidation Project			
PX0885	TIAA_NYU_00084912	TIAA_NYU_00084912	12/30/2016			Statement of Work			
PX0886	TIAA_NYU_00084913	TIAA_NYU_00084913	12/30/2016			Summary of Assets			
PX0887	TIAA_NYU_00086131	TIAA_NYU_00086226				Participants with Asset Balances			
PX0888	TIAA_NYU_00089172	TIAA_NYU_00089172	10/2/2017			TIAA Retirement Annuity Contract (to participant STEFAN)			
PX0889	CLC0022194	CLC0022194	8/1/2009			SOM participants	Description of document does not match the Bates range listed.	Plaintiffs have revised the description to address Defendant's objection.	
						Exhibit A - Investment Advisory Services Agreement (Revised Effective August 2009)			

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PX0890	CLC0022195	CLC0022195	8/1/2009			Exhibit B - Fees and Expenses (Revised Effective August 2009)			
PX0891	TIAA_NYU_00020070	TIAA_NYU_00020071	2/1/2013			Email Garrison to Petti (cc Hollensteiner and Halley) Re: Information for NYU Human Resources (NYU Info on Fees, HR Draft Responses, Reasonableness of fees)	Document is not identifiable by the Bates range provided; Defendant preserves its right to object to this document	Plaintiffs have revised the description to address Defendant's objection.	
PX0892	Vanguard-NYU_0000008	Vanguard-NYU_0000010	8/13/2012			Vanguard Letter to NYU SoM re: Asset Transfer Out Engagement for multiple Plans			
PX0893	Vanguard-NYU_0000051	Vanguard-NYU_0000055	5/3/2011			Letter to Sponsors re: Engagement Letter Vanguard Letter to NYU SoM re: Standard File Format			
PX0894	Vanguard-NYU_0000058	Vanguard-NYU_0000061	9/4/2009			Engagement Letter for Multiple plans			
PX0895	Vanguard-NYU_0000080	Vanguard-NYU_0000093	7/23/2009			Vanguard Implementation Services Project Scope: NYU SoM			
PX0896	Vanguard-NYU_0000204	Vanguard-NYU_0000211	6/9/2017			Vanguard Asset Transfer Out Engagement Letter for NYU Plan Authorized Investment			
PX0897	Vanguard-NYU_0000212	Vanguard-NYU_0000215	1/24/2017			Form - NYU Retirement Plan Plan Authorized Investment			
PX0898	Vanguard-NYU_0000216	Vanguard-NYU_0000219	4/4/2017			Form - NYU Retirement Plan			
PX0899	Vanguard-NYU_0000320	Vanguard-NYU_0000382	11/16/2016			Vanguard RFP Response			
PX0900	Vanguard-NYU_0000972	Vanguard-NYU_0000973	7/1/2016			VBO Commission Schedule	Document description does not match the Bates range provided. The document which matches the Bates range relates to the "VBO commission schedule". Defendant preserves the right to object to this document	Plaintiffs have revised the description to address Defendant's objection.	
PX0901	Vanguard-NYU_0000974	Vanguard-NYU_0000974	11/3/2017			Vanguard Recordkeeping Services Data Standards Policy	Document description does not match the Bates range provided. The document which matches the Bates range is the Vanguard "Recordkeeping Services Data Standards Policy". Defendant preserves the right to object to this document.	Plaintiffs have revised the description to address Defendant's objection.	
PX0902	Vanguard-NYU_0001203	Vanguard-NYU_0001218	6/30/2011	Vanguard Rep		All-in-Fee Report as of June 30, 2011			
PX0903	Vanguard-NYU_0010222	Vanguard-NYU_0010223	1/12/2017	Vanguard Rep		Email Bednar to Tocci Re: Question for Cammack re market pricing			
PX0904	Vanguard-NYU_0001296	Vanguard-NYU_0001328	6/30/2015			Vanguard All-in Fee Disclosure - NYU			
PX0905	Vanguard-NYU_0001443	Vanguard-NYU_0001468	6/30/2017			Vanguard All-in Fee Disclosure - NYU			
PX0906	Vanguard-NYU_0001469	Vanguard-NYU_0001475	2/9/2011			Vanguard All-in Fee Information - NYU			
PX0907	Vanguard-NYU_0001476	Vanguard-NYU_0001499	4/30/2013			Vanguard All-in Fee Disclosure - NYU			
PX0908	Vanguard-NYU_0001533	Vanguard-NYU_0001534	4/30/2013			Vanguard - NYU Asset and Fee Report			
PX0909	Vanguard-NYU_0001535	Vanguard-NYU_0001536	4/30/2013			Vanguard - NYU Asset and Fee Report			
PX0910	Vanguard-NYU_0001537	Vanguard-NYU_0001538	4/30/2013			Vanguard NYU-2013 Lowest SC Prior Month Assets 2012			
PX0911	Vanguard-NYU_0001539	Vanguard-NYU_0001540	4/30/2013			Vanguard - NYU Asset and Fee Report			
PX0912	Vanguard-NYU_0001541	Vanguard-NYU_0001581	5/31/2014			Vanguard All-in Fee Disclosure - NYU			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0913	vanguard-nyu_0001583	vanguard-nyu_0001583	9/30/2017			Vanguard Faculty and SOM qtrly			
PX0914	Vanguard-NYU_0010400	Vanguard-NYU_0010462	11/16/2016	Vanguard Rep		Attachment to Vanguard-NYU_0010391: Vanguard's Response to RFP			
PX0915	Vanguard-NYU_0032410	Vanguard-NYU_0032410	7/1/1905			Vanguard Pricing Recommendations			
PX0916	Vanguard-NYU_0033244	Vanguard-NYU_0033248	10/31/2016			Cammack RFP Q and A			
PX0917	Vanguard-NYU_0033330	Vanguard-NYU_0033331	2/1/2017	(164-122)	Ex. 113	Vanguard Partersnsh Report			
PX0918	Vanguard-NYU_0033605	Vanguard-NYU_0033613	8/17/2017			Vanguard All-in Fee Disclosure - NYU			
PX0919	Vanguard-NYU_0033749	Vanguard-NYU_0033757	6/30/2016			Vanguard All-in Fee Disclosure - NYU			
PX0920	Vanguard-NYU_0043225	Vanguard-NYU_0043250	12/31/2014			NYU Retirement Plan for Members of FAC, Prof Res Staff and Admin: Plan and Investment Notice			
PX0921	Vanguard-NYU_0046840	Vanguard-NYU_0046840	8/10/2011			Attachment to Vanguard-NYU_0046838: NYU Shareclass Flexibility Spreadsheet	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1602.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0922	Vanguard-NYU_0052999	Vanguard-NYU_0052999	9/4/2009			Email Roman to RFP_New_Request Re: Fw: New York University - 403(b) / 457(b) Request For Proposal	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX0923.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0923	Vanguard-NYU_0053000	Vanguard-NYU_0053023	9/4/2009			Attachment to Vanguard-NYU_0052999: New York University - 403(b) / 457(b) Request For Proposal	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX0922.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0924	Vanguard-NYU_0067367	Vanguard-NYU_0067427	12/31/2009			Vanguard Overview			
PX0925	Vanguard-NYU_0069251	Vanguard-NYU_0069251	11/6/2009			Attachment to Vanguard-NYU_0069249: Meeting Reminder: NYU Fund Change Communications Discussion	Document is part of a family of documents, which are listed as separate exhibits on the list. PX1605; PX0926.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0926	Vanguard-NYU_0069252	Vanguard-NYU_006925	11/6/2009			Attachment to Vanguard-NYU_0069249: Margaret Meagher	Document is part of a family of documents, which are listed as separate exhibits on the list. PX1605; PX0926.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0927	Vanguard-NYU_0023634	Vanguard-NYU_0023657	1/27/2014			Vanguard All-in Fee Disclosure - NYU			
PX0928			6/30/2016	Doug Chittenden Depo	Exhibit 2	Exhibit 5 to Defendant's Memo in Support of MTD - Plan Investment Notice			
PX0929			12/31/2017	Daniel Fischel Depo		CREF Stock Account Class R3 Fact Sheet			
PX0930				Daniel Fischel Depo	Exhibit 2	ERISA's Fundamental Contradiction: The Exclusive Benefit Rule (Daniel Fischel)			
PX0931			9/30/2017	Daniel Fischel Depo		TIAA Real Estate Account Quarterly Performance Analysis			
PX0932			12/31/2017	Daniel Fischel Depo		TIAA Real Estate Account Fund Fact Sheet			
PX0933			12/31/2011	Daniel Fischel Depo		TIAA Real Estate Quarterly Analysis			
PX0934				Peter Hueber Depo	Exhibit 101	Pricing Timeline - NYU/NYU Langone			
PX0935			3/1/2013	Lassaad Turki Depo	Exhibit 4	In Re Prinicipal: supplemental expert report of Lassaad Turki			
PX0936				Lassaad Turki Depo	Exhibit 17	Quarterly Asset Balances for NYU School of Medicine 403(b) Plan			
PX0937	NYU0106544	NYU0106565	10/1/2012	Mark Petti Depo		TIAA Recordkeeping Services Agreement			
PX0937	NYU0001690	NYU0001693	11/8/2013			Amended Schedule B - Plan Funding Options and Non-Proprietary Mutual Fund Fee Schedule			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0937	NYU0001705	NYU0001707	4/4/2014			Amended Schedule B - Plan Funding Options and Non-Proprietary Mutual Fund Fee Schedule			
PX0937	NYU0000611	NYU0000612	10/7/2014			Addendum to Schedule B of the TIAA Record Keeping Agreement			
PX0937	NYU0000589	NYU0000592	8/22/2016			Amendment No. 1 of the Record Keeping Services Agreement			
PX0938	NYU0000677	NYU0000677	9/9/2009			TIAA Confidentiality Agreement for RFP			
PX0939	NYU0036483	NYU0036522	1/1/2017			TIAA Amended and Restated Recordkeeping Services Agreement			
PX0939	NYU0110247	NYU0110251	3/24/2017			Amendment No. 1 to the Amended and Restated Record Keeping Services Agreement			
PX0940	NYU0111632	NYU0111668	4/11/2014			NYU Retirement Plan for Members of Faculty, Professional Research Staff and Administration			
PX0940	NYU0042697	NYU0042697	12/17/2014			First Amendment			
PX0940	NYU0007000	NYU0007000	5/24/2016			Second Amendment			
PX0940	NYU0164186	NYU0164187	7/31/2017			Third Amendment			
PX0941	NYU0107773	NYU0107798	9/1/1990			NYU Medical Center Retirement Plan for Members of Faculty, Professional Research Staff and Administration DRAFT			
PX0941	NYU0106072	NYU0106074	9/1/2004			First Amendment			
PX0941	NYU0006364	NYU0006365	12/31/2007			Second Amendment			
PX0941	NYU0106036	NYU0106036	4/28/2008			Third Amendment			
PX0942	NYU0000435	NYU0000479	12/21/2015			NYU School of Medicine Retirement Plan for Members of the Faculty, Professional Research Staff and Administration			
PX0943	NYU0035388	NYU0035432	12/5/2012			NYU School of Medicine Retirement Plan for Members of the Faculty, Professional Research Staff and Administration			
PX0943	NYU0116550	NYU0116552	12/20/2013			First Amendment			
PX0944	TIAA_NYU_00032598	TIAA_NYU_00032620	1/1/2002			NYU Retirement Plan for Members of Faculty, Professional Research Staff and Administration			
PX0945	NYU0095667	NYU0095700	9/15/2015			Retirement Choice Plus Annuity Contract: TE-403259			
PX0946	NYU0108858	NYU0108876	6/6/2012			Retirement Choice Plus Annuity Contract: CE-151576			
PX0947	NYU0109660	NYU0109693	6/1/2012			Retirement Choice Plus Annuity Contract: TE-151562			
PX0948	NYU0109694	NYU0109727	6/6/2012			Retirement Choice Plus Annuity Contract: TE-151576			
PX0949	Vanguard-NYU_0027091	Vanguard-NYU_0027094	10/2/2008	Vanguard Rep		Vanguard Recordkeeping Fee Agreement			
PX0949	Vanguard-NYU_0033869	Vanguard-NYU_0033871	10/2/2008			Schedule A - NYU Recordkeeping Fee Agreement			
PX0950	Vanguard-NYU_0033793	Vanguard-NYU_0033795	7/1/2011			Vanguard - NYU Recordkeeping Fee Agreement			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0950	Vanguard-NYU_0033830	Vanguard-NYU_0033834	7/1/2011			Schedule A - NYU Recordkeeping Fee Agreement			
PX0951	Vanguard-NYU_0033843	Vanguard-NYU_0033859	5/21/2015			Vanguard All-in Fee Disclosure - NYU			
PX0952	Vanguard-NYU_0000062	Vanguard-NYU_0000079	1/1/2008			Single Sign-On Service Agreement with Third Party Host			
PX0953	TIAA_NYU_00040996	TIAA_NYU_00040996				Attachment to: TIAA_NYU_00040986			
PX0954	TIAA_NYU_00022185	TIAA_NYU_00022190	1/11/2016			email: Rezler to Golson; re: TIAA-CREF Client List			
PX0955	NYU0164188	NYU0164194	9/7/2017			Approved Resolutions for Retirement Committee Meeting 9/7/2017			
PX0956	NYU0164381	NYU0164387	9/7/2017			Proposed Votes for Retirement Committee Meeting 9/7/2017			
PX0957	NYU0164391	NYU0164391	12/11/2017			Proposed Votes for Retirement Committee Meeting 12/11/2017			
PX0958	NYU0164394	NYU0164395	12/11/2017			Proposed Votes for Retirement Committee Meeting 12/11/2017			
PX0959	NYU0164396	NYU0164511	12/11/2017			Committee Meeting Materials 12/11/2017			
PX0960	NYU0164512	NYU0164585	12/11/2017			Committee Meeting Supplemental Investment Information 12/11/2017			
PX0961	NYU0164586	NYU0164591	12/11/2017			Retirement Committee Draft Charter			
PX0962	NYU0164593	NYU0164701	3/16/2018			Committee Meeting Materials 3/16/2018			
PX0963	NYU0164702	NYU0164774	3/16/2018			Committee Meeting Supplemental Investment Information 3/16/2018			
PX0964	NYU0164791	NYU0164792	12/31/2017			Investment Fee & Expense Disclosure WS			
PX0965	NYU0164796	NYU0164797	12/31/2017			Plan Servicing Credit Report WS			
PX0966	NYU0164798	NYU0164798	12/31/2017			Revenue Credit Account Report WS			
PX0967	NYU0164817	NYU0164817	12/31/2017			Summary of Fees and Compensation for Your Plan WS			
PX0968	NYU0165002	NYU0165005	12/31/2017			Investment Fee & Expense Disclosure SOM			
PX0969	NYU0165013	NYU0165013	12/31/2017			Summary of Fees and Compensation for Your Plan SOM			
PX0970	Vanguard-NYU_0010885	Vanguard-NYU_0010886	2/28/2017			Email RE: No decision yet, but an update on NYU			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0971	CLC0000846	CLC0000849		(164-081)	Ex. 072	Advantages of Consolidating an ERISA 403(b) Program into a Single Investment Provider Arrangement	This document is not relevant per FRE 401-402 as it does not pertain to the Plans. Additionally, it contains hearsay (FRE 801-802).	The 2009 RFP resulted in recordkeeping contracts within the class period making it probative to their reasonableness. Defendant has argued its conduct is prudent because of the existence of the 2009 RFP making the underlying bids probative. The parties have stipulated that this is a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the provider's response to the RFP or to provide the existence of the proposal. See FRE 801	
PX0972	CLC0001265	CLC0001275	6/4/2008			NYU Defined Contribution Plan Observations	This document contains irrelevant information per FRE 401-403.	Defendant has not identified what information within the document is irrelevant to allow Plaintiffs to respond to its objections. However, the document is part of Cammack's bid to become investment advisor to the Plans. NYU argues its retention of Cammack demonstrates its prudence during the class period. Therefore, the process of retaining Cammack, the recommendations that Cammack gave and the extent to which NYU followed Cammack's recommendations are all probative to NYU's prudence.	
PX0973	CLC0001349	CLC0001393	6/4/2008			Cammack DC Plan Consulting Services Version 6	This document contains irrelevant information per FRE 401-403. Cumulative; same document as PX0013.	The documents is not cumulative because it is a different version of PX0013, not an identical document. Defendant has not identified what information within the document is irrelevant to allow Plaintiffs to respond to its objections. However, the document is part of Cammack's bid to become investment advisor to the Plans. NYU argues its retention of Cammack demonstrates its prudence during the class period. Therefore, the process of retaining Cammack, the recommendations that Cammack gave and the extent to which NYU followed Cammack's recommendations are all probative to NYU's prudence. Moreover, Defendant has waived any objection to its relevance or opened the door to its relevance by offering DX422, which is another version of this document	
PX0974	CLC0002586	CLC0002626	1/1/2009	Mark Petti Depo		NYU School of Medicine Retirement plan for Members of the Faculty, Professional Research and Staff and Administration	Cumulative; same document as PX21	Resolved - PX21 deleted	
PX0975	CLC0023311	CLC0023312	1/13/2010			Email Meagher to Rezler (cc: Levy and Webb) Re: Update	Cumulative; same e-mail is contained within PX0975 and does not contain attachments.	Resolved - PX192 deleted	
PX0976	CLC0009559	CLC0009559		(164-076)	Ex. 067	Advantages of Consolidation to a Single Vendor	Incomplete per FRE 106. The Bates range and the description only indicate a portion of a document; the proposed exhibits are two documents, CLC0009559 & CLC0009560-CLC0009576. Cumulative of PX0976, PX1016, PX1026	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the bates range has been corrected, mooting Defendant's objection. Finally, this exhibit is a revision to the page which is contained in other exhibits listed here. There is no other exhibit that contains this slide as it is in PX0976.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0977	CLC0023343	CLC0023343	1/25/2010			Email re: Vanguard fund usage	This document contains irrelevant information per FRE 401-403. Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0978.	<p>The document relates to the number of funds in the Plans and removal of funds which is probative of NYU's ability to conduct a prudent investment review.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX0978	CLC0023344	CLC0023344	4/19/2010			Vanguard Fund Balance	This document contains irrelevant information per FRE 401-403.	<p>The document relates to the number of funds in the Plans and removal of funds which is probative of NYU's failure to implement a prudent process to review investments.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX0979	CLC0023620	CLC0023620	3/31/2010			Email - What I was going to call you about	This document contains irrelevant information per FRE 401-403.	<p>Defendant has not identified what information within the document is irrelevant to allow Plaintiffs to respond to its objections. However, the document is part of Cammack's bid to become investment advisor to the Plans. NYU argues its retention of Cammack demonstrates its prudence during the class period. Therefore, the process of retaining Cammack, the recommendations that Cammack gave and the extent to which NYU followed Cammack's recommendations are all probative to NYU's prudence. Additionally, it is probative of NYU's investment review process in that it discusses the number of funds in the Plans and the investment review process for those funds.</p>	
PX0980	CLC0023654	CLC0023659	4/19/2010			Single Provider Article	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801. It is also a learned treatise under 803(18). Plaintiffs do not understand Defendant's objection regarding improper expert testimony.</p>	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0981	CLC0023687	CLC0023688	4/16/2010		RE: Revised minutes	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX0982. Not relevant. FRE 401, 402, and 403. e-mail states that template may not apply to NYU.		The document is probabative under FRE 401 because the email expressly states that the entire document was shared at a committee meeting and printed for a committee meeting. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0982	CLC0042660	CLC0042660	10/2/2014		Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee - DB Vendor Selection	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0983	CLC0023694	CLC0023695	4/26/2010		RE: TIAA Check In				
PX0984	CLC0023699	CLC0023703	4/27/2010		Email Webb to Levy Re: NYU Email Webb to Sanchez and Meagher				
PX0985	CLC0023704	CLC0023704	8/25/2009		Re: Engagement Letter Exhibits for RFP engagement				
PX0986	CLC0023705	CLC0023706	8/1/2009		Exhibit A - Investment Advisory Services Agreement (Revised Effective August 2009)	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included as separate exhibits. PX0989.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0987	CLC0023707	CLC0023707	8/1/2009		Exhibit B - Fees and Expenses (Revised Effective August 2009)				
PX0988	CLC0023708	CLC0023708	5/1/2010		Exhibit A - Investment Advisory Services Agreement (Revised Effective May 2010)				

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0989	CLC0023709	CLC0023709	5/1/2010		Exhibit B - Fees and Expenses (Revised Effective May 2010)	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. PX0986.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0990	CLC0023718	CLC0023718	5/21/2010		Email - Agenda item for retirement committee on 6/14	Not relevant. FRE 401, 402, and 403. E-mail relates to funds not at issue and do not relate to claims remaining.		The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0991	CLC0023723	CLC0023723	5/28/2010		Email - Sample Communications	Incomplete document per FRE 106. The exhibit lists its attachment as separate exhibits. PX0992-0994. Not relevant. FRE 401, 402, and 403.		The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0992	CLC0023724	CLC0023724	5/28/2010		Attachment to CLC0023723: RetProgRedesign Announcement PresGeneric	Not relevant. FRE 401, 402, and 403.		The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0993	CLC0023725	CLC0023726	5/28/2010			Attachment to CLC0023723: RetProgRedesign CoverLetterGeneric VPHR	Not relevant. FRE 401, 402, and 403.	The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations.	
PX0994	CLC0023727	CLC0023728	5/28/2010			Attachment to CLC0023723: SRK VPHR SampleAnnounce 2	Not relevant. FRE 401, 402, and 403.	The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations.	
PX0995	CLC0023729	CLC0023729	5/28/2010			Email - NYU	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX0996. Not relevant. FRE 401, 402, and 403.	The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX0996	CLC0023730	CLC0023731	5/28/2010			Attachment to CLC0023729: MercerOJHU Site Visit Agenda 3- 25-10	Not relevant. FRE 401, 402, and 403.	The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations.	
PX0997	CLC0023739	CLC00237343	6/1/2010			RE: Retirement Roundtable Confirmed Colleges/Universities	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX251. Not relevant. FRE 401, 402, and 403.	The document relates to NYU's investment review process and the prudence of actively managed fund both of which are included and probative of Count V. Additionally, the document discusses NYU's reliance on Cammack and its recommendations. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX0998	CLC0023981	CLC0023981	7/1/2010		Email - Roundtable Meeting Notes		Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX261. Not relevant. FRE 401, 402, and 403.	<p>The document provides Cammack's recommendations to clients, including NYU, regarding the investment review process which is included and probative of Count V. Additionally, the discusses issues with TIAA as a recordkeeper and is probative to Count II.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).</p> <p>"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX0999	CLC0023982	CLC0023985	7/1/2010		Attachment to CLC0023981: Roundtable Meeting Notes		Not relevant. FRE 401, 402, and 403.	<p>The document provides Cammack's recommendations to clients, including NYU, regarding the investment review process which is included and probative of Count V. Additionally, the discusses issues with TIAA as a recordkeeper and is probative to Count II.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).</p> <p>"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1000 PX1001	CLC0024075 CLC0024079	CLC0024075 CLC0024085	7/15/2010 3/31/2010		Email Addendum Watch List Funds				
PX1002	CLC0024086	CLC0024089	6/14/2010		DRAFT - Investment Policy Statement		Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)).</p> <p>"The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1003	CLC0024246	CLC0024247	9/8/2010		RE: Follow up				

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1004	CLC0024248	CLC0024248	9/8/2010		Email - Overview of Retirement Committee Discussion on QDIA	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1004. Not relevant. FRE 401, 402, and 403.		The document relates the investment review process and the prudence of active versus passive investment options which are included and probative of Count V. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1005	CLC0024249	CLC0024249	9/8/2010		Attachment to CLC0024248: NYU Overview of Retirement Committee QDIA Discussions	Not relevant. FRE 401, 402, and 403.		The document relates the investment review process and the prudence of active versus passive investment options which are included and probative of Count V.	
PX1006	CLC0024291	CLC0024292	9/15/2010		RE: Overview of Retirement Committee Discussions on QDIA	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1007. Not relevant. FRE 401, 402, and 403.		The document relates the investment review process and the prudence of active versus passive investment options which are included and probative of Count V. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1007	CLC0024293	CLC0024294	9/15/2010		Attachment to CLC0024291: NYU Overview of Retirement Committee QDIA Discussions markup	Not relevant. FRE 401, 402, and 403.		The document relates the investment review process and the prudence of active versus passive investment options which are included and probative of Count V.	
PX1008	CLC0024297	CLC0024298	9/17/2010		RE: NYU	Not relevant. FRE 401, 402, and 403.		This document relates to the delays in the 2009 RFP process and thus the prudence of Defendant's process.	
PX1009	CLC0024306	CLC0024306	9/17/2010		RE: NYU QDIA Letter	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1010.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1010	CLC0024307	CLC0024322	9/17/2011			Attachment to CLC0024306: Meeting Your Fiduciary Responsibilities	Cummulative as duplicative of PX0629, PX0719, and PX0843. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List. Document contins hearsay FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the priciples within the document. See FRE 801.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p> <p>Unique versions of this document are on the exhibit list. The only duplicates of this document that remain are ones included to respond to Defendant's objection regarding completeness.</p>	
PX1011	CLC0024325	CLC0024326	9/20/2010		RE: NYU		Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX280.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1012	CLC0024332	CLC0024332	9/21/2010		Email - NYU		Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX283.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1013	CLC0024334	CLC0024334	9/21/2010						

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1014	CLC0024335	CLC0024335	9/23/2010	Susanna Hollnsteiner Depo	Exhibit 6	NYU Retirement Plan Committee Meeting Minutes	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1015	CLC0024340	CLC0024341	9/22/2010			FW: TIAA-CREF Foreign Participant Follow-UP	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX286.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1016	CLC0024348	CLC0024367	9/23/2010	Tina Suhr Depo	Exhibit 113	Cammack NYU Vendor Consolidation	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list. Cumulative of PX0976, PX1016, PX1026	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. PX0976 is a revised page from this exhibit. PX1016 and PX1026 are retained in response to FRE 106 objections.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1017	CLC0024484	CLC0024484	10/11/2010			Email - Ropes & Gray Letter regarding Brokerage Window	Incomplete document per FRE 106. The exhibit lists its attachment as separate exhibits. PX1474-75	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1018	CLC0024615	CLC0024618	10/29/2010			Attachment to CLC0024613: TIAA-CREF Foreign Participant Fact Sheet for NYU			
PX1019	CLC0024488	CLC0024488	10/11/2010			Attachment to CLC0024484: ATT06631.txt			
PX1020	CLC0024613	CLC0024614	10/29/2010			Email re: Treatment of Foreign Participants Under the TIAA Single Source Recordkeeping Platform	Cummulative; same e-mail is contained within PX0214 and does not contain attachments.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. The two referenced exhibits are distinct and not duplicative.	
PX1021	CLC0024634	CLC0024635	11/2/2010			Email Woodruff to Committee Re: Retirement Committee Conference call 11/2, 3PM	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1022	CLC0024636	CLC0024638	9/23/2010			Attachment to CLC0024634: NYU Retirement Committee Meeting Minutes			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1023	CLC0024639	CLC0024642	10/29/2010			Attachment to CLC0024634: TIAA-CREF Foreign Participant Fact Sheet for NYU	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1024	CLC0024643	CLC0024645	10/4/2010			Attachment to CLC0024634: Memo re: Brokerage Windows - Fiduciary Obligations	Cummulative; same document as PX1018 and PX1049, Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits were deleted from Plaintiffs' list; any remaining duplicates were retained or included to respond to Defendant's objection regarding completeness.	
PX1025	CLC0024662	CLC0024663	11/2/2010	Nancy Sanchez / Tina Suhr Depo		Email from J. Rezler to L. Woodruff re NYU Vendor Consolidation Information	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1026.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1026	CLC0024664	CLC0024680	9/23/2010	Nancy Sanchez / Tina Suhr Depo		Attachment to CLC0024662: NYU and NYU Langone Medical Center Vendor Consolidation	Cummulative of PX0976, PX1016, PX1026. Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. The identified exhibits are either unique or retained for the sole purpose of addressing Defendant's objections regarding completeness.	
PX1027	CLC0024700	CLC0024701	11/2/2010			Re: REMINDER: Retirement Committee Conference Call- 11/2, 3PM.msg			
PX1028	CLC0024702	CLC0024711	11/2/2010			International Pension Plan Executive Summary - Investment Strategy	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the International Pension Plan. Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The documents discussions the benefits of the consolidation to a single recordkeeper for a defined contribution plan and is probabative to the NYU's knowledge of the cost savings to participants from consolidation. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1029	CLC0024712	CLC0024756	11/2/2010			NYU Investment Strategy	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the International Pension Plan. Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	PX1029 relates to the lack of prudent investment oversight process of the NYU fiduciaries by contrasting it with the process the same fiduciaries used with a different plan.. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1030	CLC0024757	CLC0024766	11/2/2010	Appendix - FPI - Funds & Performance.pdf					

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1031	CLC0024793	CLC0024797	11/8/2010		RE: TIAA-CREF Pricing Follow-Up for NYU	Document references an outside report that is Hearsay (801-802). Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX316.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1032	CLC0024951	CLC0024952	11/22/2010		RE: Lower-cost share classes available to your plan	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX331.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1033	CLC0024976	CLC0024977	11/24/2010		FW: Revised consolidation overview	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX335.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1034	CLC0024987	CLC0024988	11/24/2010		RE: NYU	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX337.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1035	CLC0025143	CLC0025144	12/30/2010		FW:		Cummulative of PX350; Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX351-353.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Any duplicative exhibit has been deleted.	
PX1036	CLC0025145	CLC0025152	12/31/2010			Attachment to CLC0025143: tiaa recordkeeping presentation by cammack	Cummulative of PX351	Any duplicative exhibit has been deleted.	
PX1037	CLC0025153	CLC0025166	1/1/2011			Attachment to CLC0025143: NYU Vendor Consolidation Overview For Core Leadership_December 2010_12162010 edits	Cummulative of PX352	Any duplicative exhibit has been deleted.	
PX1038	CLC0025167	CLC0025170	1/2/2011			Attachment to CLC0025143: Fwd_RE_Fwd_RE_Revised consolidation summary	Cummulative of PX353	Any duplicative exhibit has been deleted.	
PX1039	CLC0025238	CLC0025241	1/7/2011			Re: NYU Ret Com Mtg agenda	Cummulative of PX365	Any duplicative exhibit has been deleted.	
PX1040	CLC0025247	CLC0025247	9/30/2010			Retirement Committee Materials for today's meeting			
PX1041	CLC0025248	CLC0025248	1/10/2011			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1042	CLC0025249	CLC0025251				NYU Retirement Committee Meeting Minutes 11-2-2010			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1043	CLC0025252	CLC0025259	1/10/2011			NYU and NYU LMC Retirement Plan Vendor Consolidation	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1044	CLC0025260	CLC0025273	1/10/2011			NYU and NYU LMC Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1045	CLC0025282	CLC0025282	1/14/2011			FW: Brokerage account agreement	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Pension Plan. Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX1046-7	The documents are probative because while the file names says "pension" the actual content of the documents relates to 403(b) plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1046	CLC0025283	CLC0025286	1/14/2011			Attachment to CLC0025282: PensionSDAScreenshots 2	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Pension Plan.	The documents are probative because while the file names says "pension" the actual content of the documents relates to 403(b) plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1047	CLC0025287	CLC0025293	1/14/2011			Attachment to CLC0025282: Pension-SDA CAA April 2008	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Pension Plan.	The documents are probative because while the file names say "pension" the actual content of the documents relates to 403(b) plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1048	CLC0025294	CLC0025295	1/18/2011			FW: Ropes & Gray Letter regarding Brokerage Window	Incomplete document per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1049	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1049	CLC0025296	CLC0025298	1//18/2011			Attachment to CLC0025294: Brokerage Memo From Ropes 9 2010	Cummulative; same document as PX1026 and PX1018.	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1050	CLC0025308	CLC0025308	1/19/2011			Email - Revised Exec Summary and Pricing Illustration	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX0252-3.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1051	CLC0025388	CLC0025389	2/1/2011			RE: Here is how Purdue explained the impact of the recordkeeping savings on participant account balances	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1052	CLC0025410	CLC0025411	2/1/2011			RE: fidelity	This document contains hearsay. FRE 801-802. Cumulative; same e-mail is contained within PX1053.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801.	
PX1053	CLC0025412	CLC0025413	2/1/2011	(164-071)	Ex. 062	Email from Levy to Meagher re Fidelity	This document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801.	
PX1054	CLC0025448	CLC0025450	2/7/2011			TIAA-CREF Communication Process for Complex Plan Transitions	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX1055-6	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1055	CLC0025451	CLC0025491	2/7/2011			Attachment to CLC0025448: C48795 BMC Transition Workshop	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Boston Medical Plan.	The document is probative to demonstrate actions other prudent fiduciaries were taking including consolidating to a single recordkeeper for lower fees and to rebut Defendant's claims regarding the prevalence of multiple recordkeepers with 403(b) Plans	
PX1056	CLC0025492	CLC0025499	2/7/2011			Attachment to CLC0025448: BMC CE Plan	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Boston Medical Plan.	The document is probative to demonstrate actions other prudent fiduciaries were taking including consolidating to a single recordkeeper for lower fees and to rebut Defendant's claims regarding the prevalence of multiple recordkeepers with 403(b) Plans	
PX1057	CLC0025513	CLC0025514	2/14/2011			Email - Brokerage information	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX1058-60.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1058	CLC0025515	CLC0025516	2/14/2011			Attachment to CLC0025513: Sample Investment Policy Statement Language			
PX1059	CLC0025517	CLC0025520	2/14/2011			Attachment to CLC0025513: EBN Authenticity FRE 901. This document contains Self-directed Brokerage Accounts	hearsay. FRE 801-802. Improper expert testimony. FRE 702.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1060	CLC0025521	CLC0025522	2/14/2011			Attachment to CLC0025513: Citibank Self-directed Brokerage	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding the principles within the document. See FRE 801. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1061	CLC0025523	CLC0025527	2/15/2011	(164-072)	Ex. 063	Email from Abban to Levy re Thank you/NYU	E-mail contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying conversation and not for the truth of the matter asserted. See FRE 801.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1062	CLC0025527	CLC0025530	2/15/2011			RE: Thankyou/ NYU	E-mail contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying conversation and not for the truth of the matter asserted. See FRE 801.	
PX1063	CLC0039282	CLC0039282	12/31/2013			NYU_Vanguard Participant Data			
PX1064	CLC0025919	CLC0025920	3/29/2011			Email - NYU Document, Revised as of 3/28/2011	Incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX1065.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1065	CLC0025921	CLC0025949	3/29/2011			Attachment to CLC0025919: final_NYU_Plan Changes Proposal DRAFT 03_28_11_LL2_P	This document contains irrelevant information per FRE 401-403.	Defendant has not identified what information within the document is irrelevant to allow Plaintiffs to respond to its objections. However, the document is probative to the similarity of recordkeeping 403(b) and 401(k) plans after the 2007 DOL regulations and the advantages of consolidating to a single recordkeeper among other things.	
PX1066	CLC0025965	CLC0025967	3/29/2011						
PX1067	CLC0025968	CLC0025971	3/21/2011						
PX1068	CLC0025972	CLC0026052	4/1/2011	(164-104)	Ex. 095	Cammack Supplemental Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1069	CLC0026102	CLC0026102	4/1/2011			Fri 4/1 Retirement Comm Materials.msg			
PX1070	CLC0026103	CLC0026106	4/1/2011			NYU_RetirementCommitteeMinutes_March2011_CURRENT DRAFT.doc			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1071	CLC0026107	CLC0026187	4/1/2011			NYU LMC Supplemental Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1072	CLC0026188	CLC0026206	12/31/2010			NYU and NYU LMC Executive Summary of Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1073	CLC0026207	CLC0026324	12/31/2010	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1074	CLC0026325	CLC0026325	4/1/2011			2011 & 2012 NYU Retirement Committee Meeting Calendar and Potential Agenda Items	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1075	CLC0026326	CLC0026354	3/28/2011			NYU and NYU LMC Plan Changes Discussion	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1076	CLC0026359	CLC0026360	4/4/2011			Re: Fri 4/1 Retirement Comm Materials.msg			
PX1077	CLC0026361	CLC0026361	4/1/2011			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1078	CLC0026362	CLC0026363	4/1/2011			RE: Fri 4/1 Retirement Comm Materials			
PX1079	CLC0026380	CLC0026380	4/13/2011			Email - Foreign Employee Issue	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1080.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1080	CLC0041218	CLC0041303	5/22/2014			Attachment to CLC0041099: NYU Retirement Committee Fiduciary Due Diligence Report			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1081	CLC0026382	CLC0026383	4/13/2011			re: Implementation Meeting	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX468.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1082	CLC0026466	CLC0026466	4/29/2011			RE: TIAA-CREF Relationship Team	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX476.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1083	CLC0026472	CLC0026473	5/5/2011			Re: Fwd: Investment Policy Statement Scanned Document	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX478.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1084	CLC0026509	CLC0026512	5/17/2011			RE: Fwd: Investment Policy Statement Scanned Document	Incomplete per FRE 106. The exhibit lists its attachments as separate exhibits. PX485; PX1085.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1085	CLC0026520	CLC0026526	5/17/2011			Attachment to CLC0026509: NYU_ Investment Policy Statement_DRAFT_March_2011 _MARKED UP VERSION		The document is probative because it relates to the meeting minutes regarding the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan. The document provides the amount of time that Committee spend reviewing investments during meetings and is probative of the prudence of the investment review process. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1086	CLC0026594	CLC0026598	6/1/2011			RE: June 9 2011 Ret Comm Mtg	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX491. Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Langone Medical Plan.		
PX1087	CLC0026870	CLC0026871	5/17/2011			NYU_RetirementCommitteeMinutes_April_2011.doc			
PX1088	CLC0026872	CLC0026872	6/9/2011			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1089	CLC0026873	CLC0026875	5/17/2011			NYU_ Investment Policy Statement_DRAFT_V2_May_2011.Doc			
PX1090	CLC0026876	CLC0026882	6/9/2011			Investment Policy Statement (Draft)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1091	CLC0026883	CLC0026889	6/9/2011			Investment Policy Statement (Draft)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1092	CLC0026890	CLC0026944	3/31/2011			NYU LMC Fiduciary Due Diligence Report - Abridged Version	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1093	CLC0026945	CLC0027081	3/31/2011	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1094	CLC0027082	CLC0027093	6/9/2011		Vanguard Retirement Plan Research		Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702. This document contains irrelevant information per FRE 401-403. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. The document is probative because it demonstrates other defined contributions plans contain significantly less investment options allowing them to conduct a more complete prudence review quarterly or annually. The document provides the amount of time that Committee spend reviewing investments during meetings and is probative of the prudence of the investment review process.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1095	CLC0027094	CLC0027099	12/31/2010		DOL FORM 886-A - Section 403(b) Compliance Check for Higher Education		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1096	CLC0027100	CLC0027100	6/2/2011		2011 & 2012 NYU Retirement Committee Meeting Calendar and Potential Agenda Items		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1097	CLC0027263	CLC0027265	7/7/2011		RE: NYU	E-mail contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX515.		<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1098	CLC0027366	CLC0027366	7/27/2011		NYU Langone - Prudential Assets	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Langone Medical Plan. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1099.		<p>The document is probative because it relates to the meeting minutes regarding the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1099	CLC0027367	CLC0027370	6/30/2011		Prudential Assets	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Langone Medical Plan.		<p>The document is probative because it relates to the meeting minutes regarding the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1100	CLC0044564	CLC0044564	2/27/2015			Email Petti to Rezler Re: NYU retirement plan improvement alternatives			
PX1101	CLC0045596	CLC0045598	2/26/2015			Attachment to CLC0045592: NYU Retirement Committee Meeting Minutes			
PX1102	CLC0027428	CLC0027429	8/8/2011			Re: August Retirement Committee Meeting			
PX1103	CLC0027430	CLC0027431	6/9/2011			NYU_RetirementCommitteeMin utes_June2011_Final.doc			
PX1104	CLC0027432	CLC0027488	6/30/2011			NYU LMC Fiduciary Due Diligence Report - Abridged Version	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1105	CLC0027489	CLC0027489	8/15/2011			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1106	CLC0027490	CLC0027490	8/15/2011			Participant Circular re: Investment Options in the NYU, NYU School of Medicine, and NYU Hospitals 403(b) and 457(b) retirement plans	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1107	CLC0027491	CLC0027624	6/30/2011	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1108	CLC0027625	CLC0027630	6/30/2011			NYU and NYU LMC Fiduciary Responsibility and Process Review	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1109	CLC0027631	CLC0027631	8/15/2011			NYU Defined Contribution Retirement Program: Vanguard Fund Mapping Timeline	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1110	CLC0027632	CLC0027636	8/9/2011			Draft Ret Comm Charter	Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1111.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1111	CLC0027637	CLC0027641	7/28/2011			NYU Retirement Plan Committee Charter	Cummulative, same document at PX0525 and PX0558.	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1112	CLC0027646	CLC0027652	8/12/2011			RE: FW: Re: Draft Ret Comm Charter	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX1113-5.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1113	CLC0027653	CLC0027655	8/12/2011			Attachment to CLC0027646: Sample- ABC University Pension Committee Charter			
PX1114	CLC0027656	CLC0027657	8/12/2011			Attachment to CLC0027646: CalSTRS_Charter.	Authenticity FRE 901. This document contains hearsay.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying documentand not for the truth of the matter asserted. See FRE 801.	
PX1115	CLC0027658	CLC0027660	8/12/2011			Attachment to CLC0027646: Pepperdine_Charter	Authenticity FRE 901. This document contains hearsay.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1116	CLC0027671	CLC0027671	8/15/2011			NYU and NYU LMC Retirement Plans - Additional Topics for Discussion	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1117	CLC0027858	CLC0027865	9/12/2011		RE: NYU/ NYU Langone		E-mail contains hearsay (FRE 801-802); the recipients of portions of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1118	CLC0027899	CLC0027900	9/14/2011		RE: NYU/NYU Langone		E-mail contains hearsay (FRE 801-802); the recipients of portions of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1119	CLC0027951	CLC0027955	9/27/2011		Fwd: Re: Draft Ret Comm Charter		Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX1120-2	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1120	CLC0027956	CLC0027959	9/27/2011		Attachment to CLC0027951: NYU_Retirement_Plan_Committee_Charter_9-20-11				
PX1121	CLC0027960	CLC0027960	9/27/2011		Attachment to CLC0027951: Sample Guideline to the Retirement Committee Charter 9-20-11				
PX1122	CLC0027961	CLC0027965	9/27/2011		Attachment to CLC0027951: NYU_Retirement_Plan_Committee_Charter_7-28-11		Cummulative, same document at PX0525 and PX0537.	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1123	CLC0028032	CLC0028033	10/4/2011		FW: Retirement HealthCare Account Pla		Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1124	CLC0028038	CLC0028038	10/6/2011			Email - Not sure I sent you these	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan. Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX1124-5.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1125	CLC0028039	CLC0028039	10/6/2011			Attachment to CLC0028038:	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans	
PX1126	CLC0028040	CLC0028040	10/6/2011			Attachment to CLC0028038:	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans	
PX1127	CLC0028041	CLC0028041	10/6/2011			Attachment to CLC0028038:	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans.	
PX1128	CLC0028257	CLC0028258	10/25/2011			RE: Pricing	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Langone Plan.	The document is probative because it relates to the meeting minutes regarding the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan.	
PX1129	CLC0028291	CLC0028291	10/28/2011			Fw: Retiree Medical	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit PX1129	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1130	CLC0028292	CLC0028293	10/28/2011			Attachment to CLC0028291: SCopierFron11102510250	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans.	
PX1131	CLC0028304	CLC0028305	10/31/2011			Email James (TIAA) to Meagher and Rezler Re: NYULMC Statement of Work (Vanguard Funds / QDIA) and Legal Document Chart for 2011/12 Transitions			
PX1132	CLC0028306	CLC0028310				NYULMC SOW (Vanguard Funds / QDIA)			
PX1133	CLC0028311	CLC0028315	10/31/2011			Letter to Sponsors re: Establishing Vanguard Target Retirement Funds and utilizing them as QDIA	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1134	CLC0028316	CLC0028319				Legal / Contractual Documents of Transition 2011 / 2012			
PX1135	CLC0028807	CLC0028807	11/14/2011			Email Hollnsteiner to Committee Re: November 14 Retirement Committee Materials			
PX1136	CLC0028808	CLC0028883	11/14/2011			NYU and NYU LMC Vanguard Investment Performance Summary	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1137	CLC0028884	CLC0028886	11/14/2011			Participant communication re: Investment changes coming to the NYU Retirement Plan	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1138	CLC0028887	CLC0028889	11/14/2011			Participant communication re: NYU Retirement Plan Fund changes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1139	CLC0028890	CLC0028891	11/14/2011			Notice to Plan Participants re: Investment changes to NYU School of Medicine 403(b) Retirement Plan	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1140	CLC0028892	CLC0028894	11/14/2011			Participant communication re: NYU School of Medicine 403(b) Retirement Plan Fund changes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1141	CLC0028895	CLC0028898							

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PX1142	CLC0028899	CLC0028899	11/14/2011		NYU Retirement Committee Meeting Agenda		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1143	CLC0028900	CLC0028947	9/30/2011		NYU and NYU LMC Fiduciary Due Diligence Report - Abridged Version		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1144	CLC0028948	CLC0029068	9/30/2011		NYU LMC Fiduciary Due Diligence Report		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1145	CLC0029069	CLC0029081	11/3/2011			Target Date Analysis 2Q 2011	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Authenticity FRE 901. This document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1146	CLC0029084	CLC0029084	11/14/2011			Email Hollnsteiner to Committee Re: November 14 Retirement Committee Materials			
PX1147	CLC0029085	CLC0029088	11/14/2011			NYU, NYU School of Medicine, and NYU Hospitals Center Retirement Plan Committee Charter	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1148	CLC0029089	CLC0029093	11/14/2011			NYU, NYU School of Medicine, and NYU Hospitals Center Retirement Plan Committee Charter	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX1149	CLC0029094	CLC0029094	11/14/2011		Guideline to the NYU Retirement Committee Charter	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1150	CLC0029198	CLC0029198	11/14/2011		Email - Letter does not get there	This document contains irrelevant information per FRE 401-403. Incomplete document per FRE 106. Further, Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.		The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1151	CLC0029246	CLC0029246	11/16/2011		Email - Letter	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit PX1152		The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1152	CLC0029247	CLC0029248	11/16/2011		Attachment to CLC0029246: NYURet Med Account 20111115	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.		The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1153	CLC0029282	CLC0029282	11/16/2011		Email - On behalf of Jeff Levy - Correspondence for Ms. Meager		Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit PX1154	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1154	CLC0029283	CLC0029285	11/16/2011		Attachment to CLC0029282: NYU_Letter		Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the Retirement HealthCare Account Plan, which is a VEBA Trust Plan.	The documents are probative because they demonstrate the prudence review that NYU conducted for other employee benefits plans and additional benefits TIAA received from its recordkeeping arrangement with the Plans.	
PX1155	CLC0031487	CLC0031488	2/8/2012		Email Woodruff to Levy (cc Hollnsteiner) Re: Cammack LaRhethe February 2012 Invoice				
PX1156	CLC0032365	CLC0032366	2/17/2012		Email Hollnsteiner to Committee Re: TIAA-CREF Matgerials for the 2/21/2012 Retirement Committee Meeting				
PX1157	CLC0032367	CLC0032371	1/15/2012		Summary of Plan Services and Costs DRAFT		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1158	CLC0032372	CLC0032381	2/21/2012		Investment Options Comparative Chart DRAFT		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1159	CLC0032382	CLC0032385	2/21/2012		How fee disclosure regulations impact plan sponsors		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1160	CLC0032386	CLC0032452	2/21/2012		TIAA-CREF Asset Management Investment Review NYU		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1161	CLC0032453	CLC0032454	2/21/2012		Vendor Expense Reconciliation and Funding of ERISA Expense Accounts		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1162	CLC0032455	CLC0032455	2/21/2012			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1163	CLC0032523	CLC0032523	2/17/2012			Email Wrightson to Committee Re: NYU Committee Meeting Follow Up			
PX1164	CLC0032524	CLC0032524	2/21/2012			Participant communication re: changes in plan line up	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1165	CLC0032525	CLC0032525	2/21/2012			NYU Retirement Program: Impact of TIAA-CREF Mutual Fund Transition to Institutional Share Classes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1166	CLC0033667	CLC0033673	5/9/2012	Lassaad Turki Depo		NYU Investment Policy Statement_DRAFT_V2_May_201_1_adopted.Doc	Cummulative, same document as PX1171.	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1167	CLC0033686	CLC0033686	CLC0033686	5/10/2012		Email Hollnsteiner to Committee Re: Remeinder, May 17, 2012 Retirement Committee Meeting			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1168	CLC0033687	CLC0033687	5/17/2012		NYU Retirement Committee Meeting Agenda		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1169	CLC0033688	CLC0033691	2/21/2012		NYU Retirement Committee Meeting Minutes				
PX1170	CLC0033692	CLC0033692	5/17/2012		NYU Retirement Committee Board Update Topics 2011-2012		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1171	CLC0033693	CLC0033699	5/17/2012		Investment Policy Statement (Draft)		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX1166.	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1172	CLC0033700	CLC0033707	5/17/2012		TIAA-CREF Driving Financial Well-Being - Engaging Employess through Communication, Education & Advice		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX1173	CLC0033708	CLC0033708	5/17/2012			Proposed 2012 & 2013 NYU Retirement Committee Meeting Calendar and Potential Agenda Items	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1174	CLC0033709	CLC0033787	3/31/2012			NYU and NYU LMC Fiduciary Due Diligence Report - Abridged Version	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1175	CLC0034148	CLC0034148	6/26/2012						
PX1176	CLC0034149	CLC0034156	6/21/2012			Letter to NYU re: Scope of Work	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1177	CLC0034483	CLC0034487	8/28/2012						

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PX1178	CLC0034488	CLC0034488	6/30/2012			NYU Number of Participants and balances	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1179	CLC0034782	CLC0034783	9/4/2012			Email Meagher to Committee Re: September 4, 2012 Retirement Committee Meeting			
PX1180	CLC0034784	CLC0034784	9/4/2012			Attachment to CLC0034782: Proposed Votes for Retirement Committee - Changes to Medical Center 403(b) and 457(b) Plans	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1181	CLC0034785	CLC0034785	9/4/2012			Attachment to CLC0034782: Proposed Votes for Retirement Committee - Service Credit for Medical Center Acquisitions	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1182	CLC0034786	CLC0034789	9/4/2012			Attachment to CLC0034782: Exhibit A - NYU Hospitals Center 403(b) and 457(b) Fund Menu Effective 11/01/2012	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Hospitals Center Plan. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	This document is probative because it demonstrates NYU's investment review process for similar plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1183 PX1184	CLC0035505 CLC0035507	CLC0035506 CLC0035507	10/4/2012						
PX1185	CLC0035508	CLC0035508	12/31/2011			NYU TIAA Faculty	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1186	CLC0035930	CLC0035934	9/30/2012			NYU Current and Sample Investment Grids	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1187	CLC0035959	CLC0035961							

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1188	CLC0035962	CLC0035962	11/12/2012		NYU Retirement Committee Meeting Agenda		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1189	CLC0035963	CLC0035966							
PX1190	CLC0035967	CLC0036063	9/30/2012		NYU and NYU LMC Fiduciary Due Diligence Report		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1191	CLC0036064	CLC0036203	11/16/2012		NYU Vanguard Monitoring Report		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1192	CLC0036396	CLC0036397	11/16/2013		NYU Revenue Credit Account Funding		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1193	CLC0036488	CLC0036491	1/31/2013			Email and attachments re: Explanation of the Return of Excess Plan Expenses ("Revenue Credits")	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX1193, PX0362	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1194	CLC0036517	CLC0036519	2/17/2012			Attachment to CLC0036515: Vendor Expense Reconciliation and Funding of ERISA Expense Accounts			
PX1195	CLC0036520	CLC0036521	2/4/2013			Attachment to CLC0036515: CLC Edits to Pett Explanation of the Return of Excess Plan Expenses			
PX1196	CLC0036544	CLC0036563	2/1/2012			Attachment to CLC0036537: US DOL: Meeting Your Fiduciary Responsibilities	Cummulative as duplicative of PX0278, PX0719, and PX0843. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List. Document contins hearsay FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.  Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1197	CLC0036564	CLC0036565	2/1/2013			Attachment to CLC0036537: NYU Retirement Committee Program Overview for New Committee Members	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1198	CLC0036610	CLC0036610	2/15/2013			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - November 16, 2012			
PX1199	CLC0036611	CLC0036611	2/22/2013			NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1200	CLC0036612	CLC0036614	11/16/2012			NYU Retirement Committee Meeting Minutes			
PX1201	CLC0036615	CLC0036681	12/31/2012	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1202	CLC0036682	CLC0036732	12/31/2012			NYU LMC Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1203	CLC0036733	CLC0036737	9/30/2012			NYU Current and Sample Investment Grids	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1204	CLC0036767	CLC0036767	2/20/2013			Email Petti to Rezler Re: IPP summary for this Friday's Retirement committee			
PX1205	CLC0036768	CLC0036769	2/22/2013			NYU Abu Dhabi International Pension Plan RFP Summary	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Abu Dhabi Plan. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	This document was presented to the fiduciary committee for use in the due diligence meeting and is therefore probative to their process. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1206	CLC0036852	CLC0036874	2/22/2013			TIAA-CREF Asset Management Investment Review NYU	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1207	CLC0036875	CLC0036879	2/22/2013			TIAA-CREF Focus on Technology	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1208	CLC0037681	CLC0037682	6/6/2013	Vanguard Rep		Wrightson email to Hollnsteiner re NYU/NYU Langone Retirement Committee Meeting Materials for 6/14/13	Incomplete per FRE 106. The exhibit lists its attachment as separate exhibits. PX1209-16.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1209	CLC0037687	CLC0037687	6/14/2013			NYU Retirement Committee Meeting Agenda			
PX1210	CLC0037688	CLC0037692	9/28/2012			NYU, NYU School of Medicine, and NYU Hospitals Center Retirement Plan Committee Charter			
PX1211	CLC0037693	CLC0037693	6/14/2013			NYU 457(B) Plan	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU 457(b) Plan.	This document was presented to the fiduciary committee for use in the due diligence meeting and is therefore probative to their process.	
PX1212	CLC0037694	CLC0037762	3/31/2013			NYU LMC Fiduciary Due Diligence Report			
PX1213	CLC0037763	CLC0037822	3/31/2013			NYU LMC Supplemental Investment Information			
PX1214	CLC0037823	CLC0037838	6/14/2013	Patricia Halley Depo		Cammack NYU Vendor Consolidation Report			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1215	CLC0037839	CLC0037847	6/14/2013			NYU Single Recordkeeper Services Sample Implementation Plan			
PX1216	CLC0037848	CLC0037848	2/22/2013	Vanguard Rep		Vanguard Share Class Change and Fee Arrangement			
PX1217	CLC0038070	CLC0038070	9/6/2013						
PX1218	CLC0038071	CLC0038128	6/30/2013	Daniel Fischel Depo		Cammack NYU Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1219	CLC0038129	CLC0038183	6/30/2013			NYU, NYU LMC, NYU Polytechnic Institute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1220	CLC0038285	CLC0038338	1/1/2012			Higher Education Retirement Plan Survey Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1221	CLC0038632	CLC0038633	11/18/2013			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - November 25, 2013			
PX1222	CLC0038634	CLC0038637				Attachment to CLC0038632: NYU Retirement Committee Meeting Minutes			

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PX1223	CLC0038638	CLC0038638	11/25/2013			Attachment to CLC0038632: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1224	CLC0038639	CLC0038644	11/25/2013			Attachment to CLC0038632: NYU, NYU School of Medicine, and NYU Hospital Center Proposed Changes to the Retirement Plan Committee Charter	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1225	CLC0038645	CLC0038645	11/25/2013			Attachment to CLC0038632: Proposed Changes to NYU Retirement Plans	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1226	CLC0038646	CLC0038653	11/25/2013			Attachment to CLC0038632: Investment Policy Statement (Draft)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX1235.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1227	CLC0038654	CLC0038722	9/30/2013			Attachment to CLC0038632: NYU LMC and NYU Polytechnical Institute Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1228	CLC0038723	CLC0038784	11/25/2013			Attachment to CLC0038632: NYU, NYU LMC, and NYU Polytechnic Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1229	CLC0039279	CLC0039281	1/31/2014			Email re: NYU - Vanguard Participant data	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1230	CLC0039503	CLC0039504	2/19/2014			Email Wrightson to Committee Re: NYU/NYU Langone Committee Meeting Materials - February 26, 2014			
PX1231	CLC0039505	CLC0039507	11/25/2013			Attachment to CLC0039503: Retirement Committee Meeting Minutes			
PX1232	CLC0039508	CLC0039508	2/26/2014			Attachment to CLC0039503: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1233	CLC0039509	CLC0039590	12/31/2013			Attachment to CLC0039503: NYU LMC and NYU Polytechnical Institute Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1234	CLC0039591	CLC0039639	12/31/2013			Attachment to CLC0039503: NYU, NYU LMC, and NYU Polytechnic Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1235	CLC0039640	CLC0039647	2/26/2014			Attachment to CLC0039503: NYU, NYU LMC, and NYU Polytechnic Investment Policy Statement DRAFT	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX1226.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1236	CLC0039648	CLC0039648	2/26/2014			Attachment to CLC0039503: Sample Language for Evaluating Sharpe Ratio in Investment Policy Statements	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1237	CLC0040653	CLC0040654	5/16/2014			Email Rajani to Lucev Re: Fees - Request for expense excel report			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1238	CLC0040655	CLC0040655	3/31/2014			Attachment to CLC0040653: Clients - Size and Billable Expenses	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1239	CLC0040656	CLC0040657	5/16/2014			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - May 22, 2014			
PX1240	CLC0040658	CLC0040660	2/26/2014			Attachment to CLC0040656: NYU Retirement Committee Meeting Minutes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1241	CLC0040661	CLC0040661	5/22/2014			Attachment to CLC0040656: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1242	CLC0040662	CLC0040668	5/22/2014			Attachment to CLC0040656: NYU, NYU LMC, and NYU Polytechnic Investment Policy Statement DRAFT	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX0691.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1243	CLC0040669	CLC0040754	3/31/2014			Attachment to CLC0040656: Retirement Committee Fiduciary Due Diligence Report			
PX1244	CLC0040755	CLC0040813	3/31/2014			Attachment to CLC0040656: NYU LMC and NYU Polytechnic Institute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1245	CLC0040770	CLC0040773	3/31/2014			Investment Analysis List	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1246	CLC0040814	CLC0040836	5/22/2014			Attachment to CLC0040656: NYU Fiduciary Due Diligence Report 1Q 2014 Target Date Analysis	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1247	CLC0040837	CLC0040839	6/14/2010			Attachment to CLC0040656: Retirement Committee Meeting Minutes			
PX1248	CLC0040840	CLC0040860	6/14/2010			Attachment to CLC0040656: NYU LMC Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX0693.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1249	CLC0040861	CLC0040861	5/22/2014			Attachment to CLC0040656: NYU/NYU Langone Retirement Committee Meeting Target Date Fund Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Document further contains internal attachments that are not included.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1250	CLC0040870	CLC0040871	5/16/2014			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - May 22, 2014			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1251	CLC0040872	CLC0040878	5/22/2014			Attachment to CLC0040870: NYU, NYU LMC, and NYU Polytechnic Investment Policy Statement DRAFT	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX0685.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1252	CLC0041003	CLC0041005	5/22/2014			Email Rezler to Committee Re: NYU/NYU Langone Retirement Committee Meeting - May 22, 2014			
PX1253	CLC0041006	CLC0041091	5/22/2014			Attachment to CLC0041003: NYU, NYU LMC, and NYU Polytechnic Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1254	CLC0041099	CLC0041099	5/23/2014			Email Rezler to Petti Re: Meeting materials			
PX1255	CLC0041100	CLC0041102	2/26/2014			Attachment to CLC0041099: NYU Retirement Committee Minutes			
PX1256	CLC0041103	CLC0041103	5/22/2014			Attachment to CLC0041099: NYU Retirement Committee Meeting Agenda			
PX1257	CLC0041104	CLC0041162	5/22/2014			Attachment to CLC0041099: Retirement Committee Supplemental Investment Information			
PX1258	CLC0041163	CLC0041185	5/22/2014			Attachment to CLC0041099: NYU Lipper Report Q1 2014 Target Date Analysis			
PX1259	CLC0041186	CLC0041188	6/14/2010			Attachment to CLC0041099: NYU Retirement Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1260	CLC0041189	CLC0041209	6/14/2010			Attachment to CLC0041099: NYU LMC Supplemental Fiduciary Committee Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, same document as PX0689.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1261	CLC0041210	CLC0041210	5/22/2014			Attachment to CLC0041099: Target Date Fund Information			
PX1262	CLC0041211	CLC0041217	5/22/2014			Attachment to CLC0041099: NYU Investment Policy Statement May 2014 New Draft.docx			
PX1263	CLC0042342	CLC0042342	7/1/2014			NYU Retirement Plan(s) Assets	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1264	CLC0042661	CLC0042661	10/3/2014			Attachment to CLC0042660: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1265	CLC0042662	CLC0042664	10/3/2014			Attachment to CLC0042660: NYU Retirement Committee Meeting Recommendation for Pension Administration Support Vendor NYU Hospital Center Retirement Plan NYU School of Medicine Defined Benefit Retirement Plan	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1266	CLC0042665	CLC0042666	10/3/2014			Attachment to CLC0042660: NYU Retirement Committee Meeting Recommendation for Pension Automation Support Vendor NYU Staff Pension Plan	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Staff Pension Plan. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	This document is the minutes of a meeting of the NYU Retirement Committee and is probative to demonstrate among other things how often they conducted investment reviews, even if the underlying decisions at the meeting are not relevant. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1267	CLC0042745	CLC0042746	10/6/2014			Email Burns to Burns Re: Global Investing Panel			
PX1268	CLC0042747	CLC0042747				Attachment to CLC0042745: Image			
PX1269	CLC0042748	CLC0042756	9/30/2014			Attachment to CLC0042745: Index Comparison - Investment Illustration			
PX1270	CLC0042757	CLC0042757	9/30/2014			Attachment to CLC0042745: Spreadsheet listing Cammack clients. Asset Breakdown by Category.xlsx			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1271	CLC0042805	CLC0042806	10/30/2014			Email Ananthu to Morreale Re: Q3 2014 Data Dump Request	Documents contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live at trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions. Incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX705	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1272	CLC0042807	CLC0042807	10/30/2014			Attachment to CLC0042805: Q3 All Client Watch List	Irrelevant. FRE 401, 402, and 403. Document also contains hearsay. FRE 801-802.	PX1272 is probative of the process used by the Plans' fiduciaries to monitor the Plans' investments. The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1273	CLC0043275	CLC0043276	12/5/2014			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - December 11, 2014			
PX1274	CLC0043277	CLC0043277	12/11/2014			Attachment to CLC0043275: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1275	CLC0043278	CLC0043280	8/19/2014			Attachment to CLC0043275: NYU Retirement Committee Meeting Minutes			
PX1276	CLC0043281	CLC0043282	10/3/2014			Attachment to CLC0043275: NYU Retirement Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1277	CLC0043283	CLC0043283	12/11/2014			Attachment to CLC0043275: TIAA-CREF Executive Summary - Background information and Summary of TIAA-CREF's review of the NYU Local One Plan Document	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1278	CLC0043284	CLC0043363	9/30/2014			Attachment to CLC0043275: NYU, NYU LMC, and NYU Polytechnic Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative, Same document as PX0873.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1279	CLC0043364	CLC0043425	9/30/2014			Attachment to CLC0043275: NYU LMC and NYU Polytechnic Institute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1280	CLC0044565	CLC0044568	2/20/2015			Attachment to CLC0044564: NYU Retirement Plan Strategic Initiatives Discussion Document	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1281	CLC0044569	CLC0044571	1/21/2015			Attachment to CLC0044564: Vanguard Strategic Retirement Consulting Protected Benefit Analysis	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1282	CLC0044572	CLC0044574	2/26/2015			Attachment to CLC0044564: NYU Project Plan (Plan Redesign)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1283	CLC0044575	CLC0044582	2/26/2015			Attachment to CLC0044564: NYU 403(b) Plan Merger Considerations	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1284	CLC0044990	CLC0044990	4/8/2015			Email Rezler to Petti Re: Long term options for improving NYU retirement plan experience		The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1285	CLC0044991	CLC0044991	12/31/2014	Mark Petti Depo		Attachment to CLC0044990: Spreadsheet regarding Select Ivy Plus Institutions - Active Recordkeepers	Documents contains hearsay (FRE 801-802); Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1286	CLC0045378	CLC0045378	5/20/2015			Email Wrightson to Meagher and Petti Re: NYU/NYU Langone Retirement Committee Meeting			
PX1287	CLC0045379	CLC0045379				Attachment to CLC0045378: image			
PX1288	CLC0045380	CLC0045380	6/9/2015			Attachment to CLC0045378: NYU/NYU Langone Retirement Committee Meeting Agenda			
PX1289	CLC0045381	CLC0045403	3/1/2015			Attachment to CLC0045378: Fiduciary Focus - A DC Plan Trianing Module for Fiduciaries	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1290	CLC0045404	CLC0045423	6/9/2015			Attachment to CLC0045378: Meeting Your Fiduciary Responsibilities (2/2012)			
PX1291	CLC0045592	CLC0045593	6/2/2015			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - 6/9/2015			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1292	CLC0045594	CLC0045594				Attachment to CLC0045592: image		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1293	CLC0045595	CLC0045595	6/9/2015			Attachment to CLC0045592: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1294	CLC0045599	CLC0045686	3/31/2015			Attachment to CLC0045592: NYU Retirement Committee Meeting Materials	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1295	CLC0045687	CLC0045760	3/31/2015			Attachment to CLC0045592: NYU LMC and NYU Polytechnic Institute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1296	CLC0045761	CLC0045780	2/1/2012			Attachment to CLC0045592: US DOL: Meeting Your Fiduciary Responsibilities	Cummulative as duplicative of PX0278, PX0629, and PX0843. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List. Document contins hearsay FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.</p>	
PX1297	CLC0045781	CLC0045781	6/9/2015			Attachment to CLC0045592: Fiduciary Responsibility - An Overview	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1298	CLC0047985	CLC0047987	9/9/2015			Email Samlall to Ramirez Re: NYU Retiree Medical - Negative contributions in MMkt fund.			
PX1299	CLC0047988	CLC0047988	6/30/2015			Attachment to CLC0047985: TIAA CREF ALL PLANS (Clients - Fund Balances)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1300	CLC0048246	CLC0048246	9/11/2015			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - 9/15/2015			
PX1301	CLC0048247	CLC0048247				Attachment to CLC0048246:			
PX1302	CLC0048248	CLC0048248	9/15/2015			Attachment to CLC0048246: NYU/NYU Langone Retirement Committee Meeting Agenda			
PX1303	CLC0048249	CLC0048251	6/9/2015			Attachment to CLC0048246: NYU/NYU Langone Retirement Committee Q1 2015 Due Diligence Meeting Minutes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1304	CLC0048252	CLC0048332	9/15/2015			Attachment to CLC0048246: NYU/NYU Langone Retirement Committee Meeting Materials			
PX1305	CLC0048333	CLC0048408	9/15/2015			Attachment to CLC0048246: NYU/NYU Langone Retirement Committee Meeting Supplemental Investment Information			
PX1306	CLC0048720	CLC0048721	9/14/2015			Email Wrightson to self Re: Recordkeeping fees .			
PX1307	CLC0048722	CLC0048722				Attachment to CLC0048720: image001.jpg			
PX1308	CLC0048723	CLC0048723	9/14/2015			Attachment to CLC0048720: Spreadsheet listing Cammack clients. Copy of Copy of Benchmarking Recordkeeper Req Rev.xlsx			
PX1309	CLC0048843	CLC0048853	10/1/2015	(164-117)	Ex. 108	Attachment to CLC0048840: NYU Retirement Plan - Optimization Issues (CRG Draft)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1310	CLC0049003	CLC0049006	6/28/2014			Attachment to CLC0049001: Revenue Credit	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1311	CLC0049533	CLC0049534	12/10/2015			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting 12/16/2015			
PX1312	CLC0049535	CLC0049535				Attachment to CLC0049533:			
PX1313	CLC0049536	CLC0049536	12/16/2015			Attachment to CLC0049533: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1314	CLC0049540	CLC0049626	12/16/2015			Attachment to CLC0049533: NYU Retirement Committee Meeting Materials	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1315	CLC0049627	CLC0049627	12/16/2015			Attachment to CLC0049533: Vanguard Investment Alternatives - Lower cost Share Class Opportunities for NYU Langone's Plans	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1316	CLC0049628	CLC0049629	12/16/2015			Attachment to CLC0049533: NYU - Current Fees	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1317	CLC0049630	CLC0049630	12/16/2015			Attachment to CLC0049533: Proposed Streamlined Investment Array	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1318	CLC0049631	CLC0049631	12/16/2015			Attachment to CLC0049533: TIAA-CREF Plan Expenses - Options for Returning Plan Servicing Credits to Participants	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1319	CLC0049632	CLC0049707	9/30/2015			Attachment to CLC0049533: NYU LMC and NYU Polytechnic Insitute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1320	CLC0049793	CLC0049793	12/16/2015			Attachment to CLC0049791: Proposed Votes for Retirement Committee - Changes to Medical Center Retirement Plans	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1321	CLC0050198	CLC0050198	2/18/2016			Email Wrightson to Halley Re: NYU/Cammack Retirement: Signed Exhibit D			
PX1322	CLC0050199	CLC0050199				Attachment to CLC0050198:			
PX1323	CLC0050200	CLC0050203	4/8/2009	Jan Rezler Depo		Attachment to CLC0050198: Exhibit D to Cammack Investment Advisory Services Agreement (Special Projects)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1324	CLC0050400	CLC0050506	12/31/2015			Attachmet to CLC0050397: NYU, NYU LMC, and NYU Polytechnic Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List. Cumulative	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1325	CLC0050507	CLC0050533	12/31/2015			Attachmet to CLC0050397: NYU Langone Streamline Investment Array	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1326	CLC0050534	CLC0050534	3/2/2016			Attachmet to CLC0050397: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1327	CLC0050535	CLC0050614	3/2/2016			Attachmet to CLC0050397: NYU LMC and NYU Polytechnic Institute Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX1328	CLC0051142	CLC0051147	12/9/2015			Attachment to CLC0051140: Resolution of the Board of Trustees of NYU - Amendment to Retirement Plan Committee Charter	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1329	CLC0051190	CLC0051192	3/10/2016			Attachment to CLC0051188: Vanguard Funds in NYU Langone Proposed Streamline Array	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1330	CLC0051193	CLC0051194	3/5/2016			Attachment to CLC0051188: Vanguard Money Market Fund	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1331	CLC0051779	CLC0051780	3/2/2016			Attachment to CLC0051776: NYU/NYU Langone Retirement Committee Q4 2015 Due Diligence Meeting Minutes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1332	CLC0052660	CLC0052660	6/3/2016			Attachment to CLC0052655: NYU Bi-Weekly Status Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1333	CLC0052661	CLC0052665	6/3/2016			Attachment to CLC0052655: NYU Request for Proposal & Plan Merger Timeline	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1334	CLC0052666	CLC0052672	6/3/2016			Attachment to CLC0052655: RFP Vendor List	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1335	CLC0054806	CLC0054807	9/1/2016			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials			
PX1336	CLC0054808	CLC0054808				Attachment to CLC0054806:			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1337	CLC0054809	CLC0054809	9/8/2016			Attachment to CLC0054806: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1338	CLC0054810	CLC0054812	6/1/2016			Attachment to CLC0054806: NYU Retirement Committee Meeting Minutes			
PX1339	CLC0054813	CLC0054813	9/8/2016			Attachment to CLC0054806: Plan Expenses - TIAA: Options for Returning Plan Servicing Credits to Participants	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1340	CLC0054814	CLC0054914	6/30/2016			Attachment to CLC0054806: NYU, NYU LMC, and NYU Lutheran Medical Center Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1341	CLC0054915	CLC0054993	9/8/2016			Attachment to CLC0054806: NYU LMC and NYU Lutheran Medical Center Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1342	CLC0058102	CLC0058102	12/2/2016			Attachment to CLC0058099: Memo CRG to NYU Re: RFP Finalist Selection for Defined Contribution Services	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1343	CLC0058178	CLC0058179	12/6/2016			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - December 12, 2016			
PX1344	CLC0058180	CLC0058180				Attachment to CLC0058178:			
PX1345	CLC0058181	CLC0058184	9/8/2016			Attachment to CLC0058178: NYU/NYU Langone Retirement Committee Q2 2016 Due Diligence Meeting Minutes	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1346	CLC0048840	CLC0048841				Email Rezler to Halley, Petti, Hollnsteiner Re: NYU plan merger and SRK slides			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1347	CLC0058187	CLC0058213	10/1/2016			Attachment to CLC0058178: NYU Request for Proposal for Defined Contribution Recordkeeping Services	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1348	CLC0058214	CLC0058312	9/30/2016			Attachment to CLC0058178: NYU LMC, and NYU Lutheran Medical Center Fiduciary Due Diligence Report	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1349	CLC0058313	CLC0058391	12/12/2016			Attachment to CLC0058178: NYU LMC and NYU Lutheran Medical Center Supplemental Investment Information	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1350	CLC0058392	CLC0058392				Attachment to CLC0058178: NYU Retirement Committee Meeting Agenda			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1351	CLC0058490	CLC0058491	12/8/2016			Memo re: RFP Process Overview for Defined Contribution Recordkeeping Services	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1352	CLC0060067	CLC0060067	2/1/2017			Attachment to CLC0060064: NYU Finalist Meetings Agenda - Defined Contribution Retirement Plans: Recordkeeper Request for Proposal	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1353	CLC0061490	CLC0061491	2/21/2017			Email Rezler to Committee Re: Retirement Plans RFP - Additional Materials			
PX1354	CLC0061492	CLC0061496	2/27/2017			Attachment to CLC0061490: NYU Defined Contribution Program: Request for Proposal - Follow up Analysis	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1355	CLC0061627	CLC0061628	2/23/2017			Email Samlall to Committee RE: NYU/NYU Langone Retirement Committee Meeting Materials - February 23, 2017.msg			
PX1356	CLC0061629	CLC0061629				Attachment to CLC0061627: image001.png			
PX1357	CLC0061630	CLC0061630				Attachment to CLC0061627: image002.png			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1358	CLC0061631	CLC0061631	2/27/2017			Attachment to CLC0061627: Proposed Votes for Retirement Committee - Changes to NYU Hospitals Center Retirement Plans	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to NYU Hospitals and Lutheran Medical Center Plans. Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	This document is among the materials presented to the Retirement Committee during its February 2017 meeting and may be relevant to add context to that meeting or refresh the recollection of witnesses. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1359	CLC0063684	CLC0063685	5/19/2017			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - May 24, 2017	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits. Description does not match the document listed.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1360	CLC0063686	CLC0063686	5/19/2017			Attachment to CLC0063684: image003.png	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits. Description does not match the document listed.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1361	CLC0063687	CLC0063786	5/24/2017			Attachment to CLC0063684: NYU Q1 2017 Due Diligence Report	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits. Description does not match the document listed.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1362	CLC0063787	CLC0063873	5/24/2017			Attachment to CLC0063684: NYU, NYU LMC, and NYU Lutheran Medical Center Supplemental Investment Option	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits. Description does not match the document listed.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1363	CLC0063874	CLC0063874	5/24/2017			Attachment to CLC0063684: NYU Retirement Committee Meeting Agenda	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1364	CLC0063875	CLC0063881	5/24/2017			Attachment to CLC0063684: Investment Policy Statement	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1365	CLC0063882	CLC0063887	5/24/2017			Attachment to CLC0063684: TIAA and CREF Contract Comparison	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1366	CLC0063888	CLC0063891	2/23/2017			Attachment to CLC0063684: NYU/NYU Langone Retirement Committee Q4 2016 Due diligence Meeting Minutes	Incomplete per FRE 106. Pls' Ex. List does not include all family members, and lists only a portion of the family as separate exhibits.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1367	CLC0063941	CLC0063942	5/22/2017			Email Cobak to Rezler Re: NYU/NYULMC Pricing Discussion - Basic Illustration Attached			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1368	CLC0063943	CLC0063943	5/24/2017			Attachment to CLC0063941: NYU Langone Estimated Fund Expense and Investment Related Revenue as of 4/30/2017 (Excel)	Incomplete per FRE 106. Pls' Ex. List does not include all family members.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1369	CLC0064100	CLC0064101	5/24/2017			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - May 24, 2017			
PX1370 PX1371	CLC0064102 CLC0064103	CLC0064102 CLC0064103				Attachment to CLC0064100: Attachment to CLC0064100:			
PX1372	CLC0064104	CLC0064105	5/24/2017			Attachment to CLC0064100: NYU Langone Estimated Fund Expense and Investment Related Revenue as of 4/30/2017 (PDF)	Incomplete per FRE 106. Pls' Ex. List does not include all family members.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1373	CLC0064815	CLC0064817	6/20/2017			Email Rijo to Lucev (cc Rezler) Re: Required Revenue Report request (Q1 2016).			
PX1374	CLC0065895	CLC0065938	1/1/2018			Attachment to CLC0065850: NYU Retirement Plan Marked up DRAFT	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1375	CLC0066287	CLC0066300	8/15/2017			Email Rijo (envest) to Slucev (CLC) Re: Incorrect Custom Category Averages - example: TIAA TDFs exp ratio vs. MS category average		The document is probative to demonstrate the prudent actions taken by other 403(b) Plans advised by Cammack. Defendant has presented evidence of actions by other Cammack and TIAA clients to argue its conduct was objectively prudent.	
PX1376	CLC0066301	CLC0066301	8/15/2017			Attachment to CLC0066287: Cammack Overrides v2	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List. This document is also irrelevant per FRE 401-403. This document provides the names of Cammack's clients, including hospitals and other universities, and then provides their investment options. Cammack's other clients and their investment options are not at issue in this case.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1377	CLC0066315	CLC0066316	8/16/2017			Email Petti to Rezler (cc Halley) Re: Revised documents			
PX1378	CLC0066317	CLC0066357	4/1/2018			Attachment to CLC0066315: NYU Savings and Retirement Plan Document			
PX1379	CLC0066358	CLC0066401	8/15/2017			Attachment to CLC0066315: NYU Savings and Retirement Plan Marked up DRAFT	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1380	CLC0066402	CLC0066403	1/1/2018			Attachment to CLC0066315: NYU STDA Plan Document First Amendment			
PX1381	CLC0066404	CLC0066406	8/15/2017			Attachment to CLC0066315: NYU STDA Plan Document First Amendment Marked up Draft			
PX1382	CLC0066407	CLC0066419	5/1/2018			Attachment to CLC0066315: NYU 457(b) Deferred Compensation Plan Document			
PX1383	CLC0066420	CLC0066433	8/15/2017			Attachment to CLC0066315: NYU 457(b) Deferred Compensation Plan Document Marked up Draft			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1384	CLC0066434	CLC0066435	1/1/2018			Attachment to CLC0066315: NYU Faculty Plan Document Third Amendment			
PX1385	CLC0066436	CLC0066436	5/2/2017			Attachment to CLC0066315: NYU LMC Retirement Plan Loan Policy			
PX1386	CLC0066437	CLC0066438	8/3/2017			Attachment to CLC0066315: Savings and Retirement Plan Participant Loan Program - Guideines (sample)			
PX1387	CLC0067518	CLC0067520	12/21/2009		RE: UN School		This document is not relevant per FRE 401-402 as it does not pertain to the Plans. Additionally, it contains hearsay (FRE 801-802); the recipients of the e-mail have not been deposed and are not appearing live t trial, and the email does not fall under the FRE 803 or 804 hearsay exceptions.	The document is part of Cammack's bid to become investment advisor to the Plans. NYU argues its retention of Cammack demonstrates its prudence during the class period. Therefore, the process of retaining Cammack, the recommendations that Cammack gave and the extent to which NYU followed Cammack's recommendations are all probative to NYU's prudence. The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1388	CLC0068279	CLC0068531	4/15/2014		Cammack TIAA-CREF Asset Management		Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls.' Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1389	NYU0001708	NYU0001722	5/6/2010		TIAA Agreement to Provide Signature Ready ERISA Form 5500 Preparation Services				
PX1390	NYU0002023	NYU0002091	9/30/2013	Susanna Hollensteiner Depo	Exhibit 10	Cammack Executive Summary of NYU Langone and NYU Washington Square	Incomplete per FRE 106. The Bates range and the description only indicate a portion of a document; the full document is NYU0002023-91.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1391						Intentionally Left Blank			
PX1392						Intentionally Left Blank			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1393	CLC0064818	CLC0064818	6/20/2017			Cammack_Revenue_Report_062017.xlsx			
PX1394	NYU0006863	NYU0006899	1/1/2010	Susanna Hollnsteiner Depo	Exhibit 3	NYU Retirement Plan for Members of the Faculty, Professional Research Staff and Administration			
PX1395	NYU0007315	NYU0007351	1/1/2010	Mark Petti Depo / Susanna Hollnsteiner Depo	/ Exhibit 3	NYU Retirement Plan for Members of the Faculty, Professional Research Staff and Administration	Cumulative; Same document as PX907	Plaintiffs have deleted the duplicative exhibit.	
PX1396	NYU0007849	NYU0007849	9/30/2011			Re: Resolution to Eliminate Prudential from NYU Hospitals Center Fund Lineup	FRE 401-403; document does not relate to the Plans, but relates to the NYU Hospitals Center	The document is probative because the document discusses the consolidation of the Medical School Plan and related plans to a single recordkeeper.	
PX1397	NYU0008577	NYU0008579	10/16/2012	Patricia Halley Depo		Hollnsteiner email to Rezler re Vanguard Lanuches Short Term TIPS Index Fund	The subject of this document is part of Def.'s Motion in Limine. This document is not relevant, FRE 401, 402, and 403, as it relates to dismissed allegations.	The document demonstrates that the Retirement Committee was considering paring down the fund lineup for among other reasons to allow for an easier due diligence process. This is probative of purdence of Defendant's investment review process under Count.	
PX1398	NYU0008831	NYU0008831	7/18/2011			Recap of TIAA/PWC Call	Not relevant. FRE 401, 402, and 403. Document relates to a transfer issue which is not part of the allegations in this case.	Defendant has argued that TIAA's recordkeeping fees are justified by among other things its superior service. This is probative to demonstrate that TIAA's service does not justify its recordkeeping fees.	
PX1399	NYU0008834	NYU0008835	7/18/2011			Retirement Committee Meeting Minutes - June 2011	Not relevant. FRE 401, 402, and 403. Document relates to a transfer issue which is not part of the allegations in this case.	Defendant has argued that TIAA's recordkeeping fees are justified by among other things its superior service. This is probative to demonstrate that TIAA's service does not justify its recordkeeping fees.	
PX1400	CLC0048842	CLC0048842				Attachment to CLC0048840: image			
PX1401	NYU0010172	NYU0010175	10/1/2015			Exhibit D - Special Projects to Investment Advisory Services Agreement (Original Affective Date: April 8, 2009)			
PX1402	CLC0049001	CLC0049001	10/20/2015			Email Rezler to Petti Re: Revenue report			
PX1403	NYU0012656	NYU0012656	2/14/2012			Email Hollnsteiner to Committee Re: Agenda and Materials for 2/21 Retirement Committee Meeting			
PX1404	NYU0012657	NYU0012657				Attachment to NYU0012656:			
PX1405	NYU0012658	NYU0012660	12/1/2011			Attachment to NYU0012656: Participant communication re: Investment change coming to the NYU Retirement Plan for Adjunct Faculty Members	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. (PX1406, PX1407)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1406	NYU0012661	NYU0012663	10/1/2011			Attachment to NYU0012656: DOL Fact Sheet re: Final Rule to Increase Workers' Access to High Quality Investment Advice	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. (PX930, PX933)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1407	NYU0012855	NYU0012855	2/21/2012			Attachment to NYU0012656: Overview of New Investment Advice Regulations	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. (PX1405-6).	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1408	NYU0012856	NYU0012856	2/21/2012			Attachment to NYU0012656: NYU Retirement Committee Meeting Agenda			
PX1409	NYU0012857	NYU0012859	11/14/2011			Attachment to NYU0012656: NYU Retirement Committee Meeting Minutes			
PX1410	NYU0012860	NYU0012860	2/21/2011			Attachment to NYU0012656: Investment Analysis: Scorecard for FTSE Fund vs. Proposed Replacement	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. (PX1405-7).	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1411	NYU0012861	NYU0012865	2/21/2012			Attachment to NYU0012656: NYU, NYU School of Medicine, and NYU Hospitals Center Retirement Plan Committee Charter	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this list and some of which have been included s separate exhibits. (PX1405-7, PX1410)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1412	CLC0049002	CLC0049002				Attachment to CLC0049001: image			
PX1413	CLC0049791	CLC0049792	12/15/2015			Email Meagher to Committee Re: NYU/NYU Langone Retirement Committee Meeting - 12/16/2015			
PX1414	NYU0014716	NYU0014718	11/4/2013			Email Tocci to Hesler Re: Closing the Loop	Irrelevant. FRE 401, 402, and 403. Document does not relat to the Plans or allegations in the case; rather, it pertains to the "NCPL" Account	The document is relevant to demonstrate the benefits NYU received from the Plans' relationships with recordkeepers. Vanguard gave institutional status to a \$1M fund.	
PX1415	NYU0014719	NYU0014721	11/4/2013			Email Munassar to Hesler Re: NYU Audit Confirm Request	Irrelevant. FRE 401, 402, and 403. Document does not relat to the Plans or allegations in the case; rather, it pertains to the "NCPL" Account	The document is relevant to demonstrate the benefits NYU received from the Plans' relationships with recordkeepers. Vanguard gave institutional status to a \$1M fund.	
PX1416	NYU0020963	NYU0021002	10/28/2010			Employee Benefit Plan Fiduciary Liability Insurance Renewal Application	Irrelevant. FRE 401, 402, and 403. Document also contains hearsay. FRE 801-802.	The document contains information related to the amount of funds in the Plans immediately prior to the class period The document relates to NYU's fiducary liability insurance that would apply in this matter. The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1417	NYU0025060	NYU0025060	7/3/2014			Email Tocci to Hollnsteiner Re: Shareclass changes completed			
PX1418	NYU0025061	NYU0025074	6/26/2014			Attachment to NYU0025060: Vanguard Implementation Services Project Scope	Incomplete per FRE 106. This document is part of a family of documents all of which are not included on this exhibit list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1419	CLC0049537	CLC0049539	9/15/2015			Attachment to CLC0049533: NYU Retirment Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1420	CLC0051140	CLC0051141	12/9/2015			Email Meagher to Halley Re: Resolution Approved at 12-9-2015 Board of Trustees Meeting - Resolution - Retirement Plan Committee Charter Amendment 12-9-2015			
PX1421	CLC0051188	CLC0051188	3/21/2016			Email Rezler to Halley and Meagher Re: March meeting follow-up			
PX1422	NYU0026829	NYU0026834	6/6/2013			VanguardEmail.doc	Cumulative; Same document as PX0492 and PX1421	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1423	CLC0051189	CLC0051189				Attachment to CLC0051188: image			
PX1424	CLC0050615	CLC0050618	12/16/2015			Attachmet to CLC0050397: NYU/NYU Langone Retirement Committee Meeting Minutes			
PX1425	NYU0027949	NYU0027951	8/12/2011			NYU_Remediation_Letter_FINAL_REV0812	Not relevant. FRE 401, 402, and 403. Document does not relate to allegations in the case; rather, it relates to a "transfer issue"	Defendant has argued that TIAA's recordkeeping fees are justified by among other things its superior service. This is probative to demonstrate that TIAA's service does not justify its recordkeeping fees.	
PX1426	CLC0051776	CLC0051776	5/13/2016			Email Wrightson to Petti, Hollnsteiner, Halley, and Meagher Re: NYU/NYU Retirement Committee Notes and Draft Agenda			
PX1427	CLC0051777	CLC0051777				Intentionally Left Blank			
PX1428	CLC0051777	CLC0051777				Attachment to CLC0051776:			
PX1429	CLC0051778	CLC0051778				Attachment to CLC0051776:			
PX1430	CLC0051781	CLC0051781	6/1/2016			Attachment to CLC0051776: NYU/NYU Langone Retirement Committee Meeting Agenda			
PX1431	CLC0052655	CLC0052656	6/2/2016			Email Wrightson to Petti, Hollnsteiner and Halley Re: NYU/Cammack Retirement - Bi-Weekly Status Meeting			
PX1432	CLC0052657	CLC0052657				Attachment to CLC0052655: image			
PX1433	NYU0039081	NYU0039082	12/12/2016			Email Samlall to Committee Re: NYU/NYU Langone Retirement Committee Meeting Materials - December 12, 2016			
PX1434	NYU0039083	NYU0039083	12/12/2016			Attachment to NYU0039081: Proposed Votes for Retirement Committee - Changes to NYU Hospitals Center Retirement Plans	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list and those that are have been are listed separately. (PX1435)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1435	NYU0039084	NYU0039084	12/12/2016	Susanna Hollnsteiner Depo		Attachment to NYU0039081: NYU Retirement Plan Committee Meeting Agenda			
PX1436	NYU0039315	NYU0039315	12/11/2014			Attachment to NYU0039313: NYU Retirement Plan Amendment and Restatement	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list and those that are have been are listed separately. (PX1437)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1437	NYU0039316	NYU0039316	12/11/2014			Attachment to NYU0039313: Summary of Missed Retirement Plan Deferrals and Corrective Actions	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list and those that are have been are listed separately. (PX1436)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1438	NYU0039390	NYU0039391	2/26/2015			Email Yocasta to Committee Re: NYU/NYU Langone Retirement Committee Meeting - 2/26/2015			
PX1439	NYU0039421	NYU0039422	5/20/2014			Email Dorph to Hesler Re: NYU/NYU Langone Retirement Committee Meeting - May 22, 2014			
PX1440	NYU0039423	NYU0039425	2/26/2014			Attachment to NYU0039421: NYU Retirement Committee Meeting Minutes			
PX1441	NYU0039426	NYU0039426	5/22/2014			Attachment to NYU0039421: NYU Retirement Committee Meeting Agenda			
PX1442	NYU0039427	NYU0039435	5/22/2014			Attachment to NYU0039421: Draft IPS			
PX1443	NYU0039436	NYU0039521	5/22/2014			Attachment to NYU0039421: NYU Retirement Committee Meeting Due Diligence Report			
PX1444	NYU0039581	NYU0039603	5/22/2014			Attachment to NYU0039421: 1Q 2914 Target Date Funds by CLC			
PX1445	NYU0039604	NYU0039606	6/14/2010			Attachment to NYU0039421: NYU Retirement Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1446	NYU0039607	NYU0039627	6/14/2010			Attachment to NYU0039421: NYU Retirement Committee Meeting Supplemental Fiduciary Committee Information			
PX1447	NYU0039628	NYU0039628	5/22/2014			Attachment to NYU0039421: NYU Retirement Committee Meeting Target Date Fund Information			
PX1448	NYU0039629	NYU0039632	5/22/2014			Attachment to NYU0039421: Vanguard Target Retirement Funds	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list and those that are have been are listed separately. (PX1449)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1449	NYU0039633	NYU0039651	5/22/2014			Attachment to NYU0039421: Vanguard Target-Date Investments	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list and those that are have been are listed separately. (PX1148)	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1450	NYU0039652	NYU0039656	1/18/2014			Attachment to NYU0039421: Retirement Plan Committee Charter			
PX1451	NYU0039731	NYU0039731	4/28/2016			Email Halley to Ellis Re: Retirement Plan Consolidation Proposal			
PX1452	NYU0039732	NYU0039739	5/1/2016	Patricia Halley Depo		Attachment to NYU0039731: NYU Retirement Plan Consolidation Proposal	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1453	NYU0040979	NYU0040980	12/8/2016			Email Halley to Petti Re: RFP Overview memo			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1454	NYU0040981	NYU0040982	12/8/2016			Attachment to NYU0040979: Memo CRG to NYU RFP Evaluation Team Re: RFP Process Overview for Defined Contribution Recordkeeping Services	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1455	NYU0040983	NYU0040985	1/6/2017			Email Rezler to Halley Re: Finalist meetings			
PX1456	NYU0040986	NYU0040998	2/23/2017			Attachment to NYU0040983: NYU Defined Contribution Program: Request for Proposal - Executive Analysis	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1457	NYU0040999	NYU0041018	2/23/2017			Attachment to NYU0040983: NYU Defined Contribution Program: Request for Proposal - Executive Analysis			
PX1458	NYU0041631	NYU0041632	7/29/2016			Email Halley to Rezler Re: Regrouping on the MM fund changes			
PX1459	NYU0041633	NYU0041633	7/29/2016			Attachment to NYU0041631: Fee Disclosure - WS Plan			
PX1460	NYU0041634	NYU0041634	7/28/2016			Attachment to NYU0041631: Fee Disclosure - Adjunct Plan			
PX1461	NYU0041635	NYU0041638	7/28/2016			Attachment to NYU0041631: PAIF - Adjunct Plan			
PX1462	NYU0041639	NYU0041642	7/28/2016			Attachment to NYU0041631: Plan Authorized Investments Form - WS Plan			
PX1463	NYU0041643	NYU0041646	7/28/2016			Attachment to NYU0041631: PAIF - 457(b) Plan			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1464	NYU0041647	NYU0041652	9/9/2016			Attachment to NYU0041631: Vanguard Implementation Services Project Scope	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1465	NYU0042533	NYU0042533	1/11/2016			Email Halley to Gruner Re: Mercer Mailing - Voluntary Benefits		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1466	NYU0042534	NYU0042538	1/11/2016			Attachment to NYU0042533: Participant communication from Mercer	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1467	NYU0045474	NYU0045474	1/26/2017			Email Rezler to Committee Re: Retirement Plans RFP - Additional Materials		The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1468	NYU0045475	NYU0045494	2/1/2017			Attachment to NYU0045474: NYU Defined Contribution Program: RFP Appendix to Executive Analysis	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1469	NYU0049903	NYU0049904	10/14/2015	Patricia Halley Depo		Fudge email to Petti re Retirement Plan Optimization - Core	The subject of this document is part of Def.'s Motion in Limine. This document is not relevant, FRE 401, 402, and 403, as it relates to dismissed allegations.	The document is related to the Faculty Plan's consolidation to a single recordkeeper and is directly related to the prudence of the Faculty Plan's recordkeeping fees. Moreover, among the reasons the to reduce the fund line is to make due diligence investment review more streamlined, so it is probative to the prudence of NYU's due diligence review.	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1470	NYU0081760	NYU0081760	9/1/2015			Email Petti to Wrightson and Levy (cc Halley, Kartanos, Hossnsteiner, and Rezler) Re: NYU purchasing RFP template, SOW fees and meeting schedule			
PX1471	NYU0081761	NYU0081772	8/5/2015			Attachment to NYU0081760: RFP for IA to perform RFP	Incomplete per FRE 106. This document is part of a family of documents all of which have not been included on this list	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1472	NYU0082522	NYU0082523							
PX1473	NYU0082824	NYU0082824	2/1/2016			Email Munassar to Rosenberg Re: NCPL Vanguard Statement	Incomplete per FRE 106. This document is part of a family of documents which are listed separately. (PX1474) Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans, but rather relates to the "National Center of Philanthropy and the Law"	The document is relevant to demonstrate the benefits NYU received from the Plans relationships with recordkeepers. Vanguard gave institutional status to a \$1M fund. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1474	NYU0082825	NYU0082828	2/1/2016			Attachment to NYU0082824: Vanguard Year to Date Statement	Incomplete per FRE 106. This document is part of a family of documents which are listed separately. (PX1473) Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans, but rather relates to the "National Center of Philanthropy and the Law"	The document is relevant to demonstrate the benefits NYU received from the Plans relationships with recordkeepers. Vanguard gave institutional status to a \$1M fund. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1475	NYU0083752	NYU0083753	1/1/2016			Exhibit D - Special Projects to Investment Advisory Services Agreement (Original Affective Date: April 8, 2009)			
PX1476	NYU0084328	NYU0084330	8/9/2016			NYT Article re MIT, NYU, Yale Sued Over Retirement Plan Fees	Document is hearsay. FRE 801-802. Document is otherwise inadmissible. FRE 602, 701.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1477	NYU0084954	NYU0084958	8/9/2016			NYT Article re MIT, NYU, Yale Sued Over Retirement Plan Fees	Cumulative of PX1476. Document is hearsay. FRE 801-802. Document is otherwise inadmissible. FRE 602, 701.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1478	CLC0052658	CLC0052658				Attachment to CLC0052655: image			
PX1479	NYU0094076	NYU0094077		Jan Rezler Depo		The Advances of Consolidation an ERISA 403(b) Program into a Single Investment Provider Arrangement			
PX1480 PX1481						Intentionally Left Blank Intentionally Left Blank			
PX1482	NYU0094486	NYU0094487	11/11/2011			Email from TIAA SOM in a word document	Document is not an email, but is a word document. Document is not relevant. FRE 401, 402, and 403. Document does not relate to the allegations in this case, but rather relates to "Direct Transfer Remediation Efforts"	Plaintiffs have revised the description to address Defendant's objection. Further, Defendant has argued that TIAA's recordkeeping fees are justified by among other things its superior service. This is probative to demonstrate that TIAA's service does not justify its recordkeeping fees.	
PX1483	NYU0094488	NYU0094489	11/11/2011			Email from TIAA NYU WS in a word document	Document is not an email, but is a word document. Document is not relevant. FRE 401, 402, and 403. Document does not relate to the allegations in this case, but rather relates to "Direct Transfer Remediation Efforts"	Plaintiffs have revised the description to address Defendant's objection. Further, Defendant has argued that TIAA's recordkeeping fees are justified by among other things its superior service. This is probative to demonstrate that TIAA's service does not justify its recordkeeping fees.	
PX1484	NYU0095314	NYU0095314	8/16/2007			Employee Benefits update: 403(b) Regualtions	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1485	CLC0052659	CLC0052659	5/20/2016			Attachment to CLC0052655: NYU Bi-Weekly Project Status Meeting / Meeting Notes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1486	NYU0095571	NYU0095594	3/24/2010			Understanding Retirement Plan Expenses	Document contains Hearsay. FRE 801-802. Document is otherwise inadmissible. FRE 602, 701.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1487 PX1488						Intentionally Left Blank Intentionally Left Blank			
PX1489	CLC0052673	CLC0052693	6/2/2016			Attachment to CLC0052655: NYU DC Retirement Plans RFP			
PX1490	CLC0058099	CLC0058100	12/5/2016			Email Wrightson to self Re: NYU RFP one-page summary			
PX1491	CLC0058101	CLC0058101				Attachment to CLC0058099: Attachment to CLC0058099: Public Utility District No. 2 of Grant County Washington Q3 2016 Due Diligence Review Summary Sheet			
PX1492	CLC0058103	CLC0058105	11/18/2016			Vanguard Group Custodial Account Agreement Second Amendment Third Amendment First Amendment First Amendment			
PX1493	NYU0099925	NYU0099953	1/1/2008	Mark Petti Depo		Attachment to CLC0058099: Public Utility District No. 2 of Grant County Washington Deferred Compensation Committee Meeting Summary			
PX1494	NYU0106040	NYU0106041	12/20/2006						
PX1495	NYU0106335	NYU0106335	12/21/2007						
PX1496	NYU0106373	NYU0106375	12/28/2010						
PX1497	NYU0106666	NYU0106669	12/30/2005						
PX1498	CLC0058106	CLC0058108	10/31/2016						
PX1499	NYU0107412	NYU0107413	8/16/2012			NYU - Termination of Relationship Notification- Prudential	This document is not relevant per FRE 401-403 as it does not pertain to the Plans. Rather, it relates to the NYU Langone Medical Center.	The document is probative because it relates to the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan.	
PX1500	NYU0107414	NYU0107415				Letter to re: termination of contractual relationship b/w Vanguard and NYU LMC	This document is not relevant per FRE 401-403 as it does not pertain to the Plans. Rather, it relates to the NYU Langone Medical Center.	The document is probative because it relates to the consolidation of the recordkeeper for the Medical Plan, aka NYU Langone Medical Plan.	
PX1501	NYU0109001	NYU0109003	2/24/2017			Letter to Sponsors re: Statement of Work and Fund Line-up Change with Mapping	Cumulative; Document is a duplicate of PX1501	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1502	NYU0110843	NYU0110861	5/6/2009	Mark Petti Depo		Vanguard Group Custodial Account Agreement			
PX1503	CLC0058109	CLC0058111	10/31/2016			Attachment to CLC0058099: Public Utility District No. 2 of Grant County Washington Deferred Compensation Committee Meeting Summary			
PX1504	NYU0116028	NYU0116030	11/20/2015			Amendment #1 to Statement of Work			
PX1505	NYU0116600	NYU0116601	12/21/2015			Amendment #2 to Statement of Work			
PX1506	NYU0129591	NYU0129605	1/1/2017			Amended and Restated Custodial Account Agreement for Private ERISA 403(b) Plan			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1507	NYU0145669	NYU0145669	6/1/2012			Email - Important Reading to Understand current issues of 4039b) Plans	This document is incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1508.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1508	NYU0145670	NYU0145677	3/1/2012			Attachment to NYU0145669: Luckenbach_BMMarch	This document is incomplete per FRE 106. The exhibit lists its attachment as a separate exhibit. PX1507. This document also contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1509	NYU0158862	NYU0158862	3/12/2012			Email Nitze to Bailey, J Re: TIAA strategy			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1510	NYU0158863	NYU0158865	2/29/2012			Attachment to NYU0158862: TIAA/NYULMC Marketing Stratgey Meeting	This document is incomplete per FRE 106. The exhibit lists does not include all family member for the document listed. This document also contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1511	NYU0159444	NYU0159444	3/28/2012			Email Karasoula to Bailey A, Bailey J, Meagher, and Sanchez Re: minutes from the last leadership meeting 01_25			
PX1512	NYU0159445	NYU0159445	1/25/2012			Attachment to NYU0159444: Leadership Meeting Agenda and Minutes	This document is incomplete per FRE 106. The exhibit lists does not include all family member for the document listed. This document also contains hearsay. FRE 801-802 This document is not relevant. FRE 401-403. The document does not relate to the Plans.	The document discusses the benefits of the Medical Plan's consolidation to a single recordkeeper and is probative of the prudence of the Plans' recordkeeping fees. The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1513	NYU0162850	NYU0162852	5/24/2017			NYU/NYU Langone Retirement Committee Q1 2017 Due Diligence Meeting Minutes	Cumulative; this document is the same as PX0662	Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1514	NYU0164400	NYU0164403	9/7/2017			NYU/Langone Retirement Committee Meeting Minutes			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1515	NYU0164597	NYU0164599	12/11/2017			NYU/Langone Retirement Committee Meeting Minutes			
PX1516	PLA-NYU-005390	PLA-NYU-005409		(164-141)	Ex. 132	Minutes of the faculty senators council meeting	Incomplete per FRE 106. The Bates range only indicates a portion of a document.	Plaintiffs have revised the description to address Defendant's objection.	
PX1517	CLC0058112	CLC0058139	10/5/2016			Attachment to CLC0058099: NYU Request for Proposal for Defined Contribution Recordkeeping Services			
PX1518	PLA-NYU-005410	PLA-NYU-006822		(164-040)		Minutes of the faculty senators council meeting	Incomplete per FRE 106. The Bates range only indicates a portion of a document.	Plaintiffs have revised the description to address Defendant's objection.	
PX1519	CLC0066248	CLC0066257	8/15/2017			RE: Incorrect Custom Category Averages - example" TIAA TDFs exp ratio vs. MS category average			
PX1520	CLC0066258	CLC0066258	8/15/2017			Cammack_overrides.xlsx			
PX1521	CLC0058140	CLC0058148	2/17/2016			Attachment to CLC0058099: Memo CRG to State of Delaware Deferred Compensation Council, Office of the State Treasurer Re: State of Delaware RFP Process: Recommendation of Service Model and Vendor			
PX1522	CLC0058185	CLC0058186	1/1/2016			Attachment to CLC0058178: Local One Plan Document Fifth Amendment			
PX1523	CLC0060064	CLC0060065	1/25/2017			Rezler to Halley (cc Petti) Re: RFP meeting attendees			
PX1524	TIAA_NYU_00020072	TIAA_NYU_00020072	3/14/2012			Attachment to TIAA_NYU_00020070: Executive Summary - Draft responses for NYU Human Resources - Transition to Lower Share Class (i-shares). PX0891	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1525	TIAA_NYU_00020073	TIAA_NYU_00020073	3/14/2012			Attachment to TIAA_NYU_00020070: Part of Family - PX0891			
PX1526	TIAA_NYU_00020074	TIAA_NYU_00020085	1/31/2012			Attachment to TIAA_NYU_00020070:			
PX1527	TIAA_NYU_00020086	TIAA_NYU_00020088	12/31/2011			Attachment to TIAA_NYU_00020070:			
PX1528	TIAA_NYU_00020685	TIAA_NYU_00020687	9/18/2014			Email Pereira to Cicalese Re: NYU Revenue Credit Report & Sample EE Communication			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1529	TIAA_NYU_00020688	TIAA_NYU_00020688	7/1/2014			Attachment to TIAA_NYU_00020685: NYU Retirement Plan(s) Assets/Revenue (2013 - June 2014)	Incomplete per FRE 106. This document is part of a family of documents that have not been included on Pls Exhibit List.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1530	TIAA_NYU_00024074	TIAA_NYU_00024074	8/9/2011			TIAA Benefit Responsive	Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1531	TIAA_NYU_00027981	TIAA_NYU_00027981	1/6/2017			Email Petti to Pereira (cc Hollnsteiner Re: Communications to NYU plan sponsors Attachment to TIAA_NYU_00027981: TIAA Retirement Annuity Contract (to participant LESCANO)	Incomplete Per 106. This document does not include all of the terms of the contract.		
PX1532	TIAA_NYU_00027982	TIAA_NYU_00027986	1/5/2038			Attachment to TIAA_NYU_00027981: TIAA Retirement Annuity Contract (to participant LESCANO)	Incomplete Per 106. This document does not include all of the terms of the contract.	The proposed exhibit contains the only terms of the contract that were produced to Plaintiffs.	
PX1533	CLC0060066	CLC0060066				Attachment to CLC0060064:			
PX1534	TIAA_NYU_00028851	TIAA_NYU_00028852	2/11/2010			Email Conmy to Rezler Re: NYU RFP meeting	Incomplete per FRE 106. This document purports to attachment materials that have been excluded from the exhibit.	The exhibit is complete and listed here as it was produced to Plaintiffs. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575- 76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1535	TIAA_NYU_00032299	TIAA_NYU_00032300	8/13/2009			FW: NYU Retirement Plan - safe harbor plan effective 1/1/2010	Hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1536	TIAA_NYU_00032803	TIAA_NYU_00032809	9/17/2012			Email re: Syracuse Q2 Cash flow questions	Hearsay. FRE 801-802. And not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue or NYU. Relates to Syracuse University.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1537	TIAA_NYU_00032810	TIAA_NYU_00032810	9/17/2012			Statement of Changes to Net Assets Q2 - Excel spreadshe	Hearsay. FRE 801-802. And not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue or NYU. Relates to Syracuse University.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1538	TIAA_NYU_00033772	TIAA_NYU_00033772	7/29/2014			NYULMC Retirement Checkup Status Report	Not relevant. RE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to a Retiree Health Plan	The document includes data related to the annuity contracts in the Plans and is relevant to Plaintiffs' recordkeeping and investment prudence claims.	
PX1539	TIAA_NYU_00035643	TIAA_NYU_00035652	6/26/2015			Benefit Invoices from SOM	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to a NYU Langone Plan not the Medical Plan.	Plaintiffs do not understand Defendant's objection because the document relates to School of Medicine Plan, which is at issue in this case.	
PX1540	TIAA_NYU_00036464	TIAA_NYU_00036485	12/31/2015			NYU SoM 403(b) Retirement Plan: Plan and Investment Notice	Not relevant. FRE 401, 402 and 403. Document does not relate to the Plans at issue, but rather relates to a NYU Langone Plan not the Medical Plan.	Plaintiffs do not understand Defendant's objection because the document relates to School of Medicine Plan, which is at issue in this case.	
PX1541	CLC0060068	CLC0060068	1/25/2017			Attachment to CLC0060064: Defined Contribution Retirement Plan RFP Finalist Presentation Sample Questions			
PX1542	CLC0060069	CLC0060069	1/25/2017			Attachment to CLC0060064: draft email to finalists			
PX1543	CLC0065850	CLC0065952	8/3/2017			Email Petti to Rezler (cc Halley) Re: Updated 403(b) restatement and free standing 403(b) amendments			
PX1544	TIAA_NYU_00039660	TIAA_NYU_00039663	6/12/2012			Revenue Credit Account Arrangement	Not relevant. FRE 401, 402 and 403. Document does not relate to the Plans at issue, but relates to NYU SOM supplemental plans and 457(b) plans.	Plaintiffs do not understand Defendant's objection because the document relates to School of Medicine Plan, which is at issue in this case.	
PX1545	TIAA_NYU_00051127	TIAA_NYU_00051127	12/16/2009			RFP Kits	Hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1546	TIAA_NYU_00058549	TIAA_NYU_00058551	9/9/2015			Email Samlall to Ramirez Re: NYU Retiree Medical Negative contributions in MMkt fund			



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1547	TIAA_NYU_00058552	TIAA_NYU_00058552				Attachment to TIAA_NYU_00058549: TIAA CREF ALL PLANS.xls	The description does not relate to the Bates range provided. Document is incomplete per FRE 106 as it does not include its cover email.	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575- 76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1548	TIAA_NYU_00083697	TIAA_NYU_00083698	2/3/2015			Email Garrison to Petti, Hollnsteiner Re: Final agenda and meeting materials for tomorrow's meeting			
PX1549	TIAA_NYU_00083699	TIAA_NYU_00083700	2/4/2015			Attachment to TIAA_NYU_00083697: NYU - TIAA-CREF Business Planning Meeting Agenda			
PX1550	TIAA_NYU_00083701	TIAA_NYU_00083769	7/7/1905	Peter Hueber Depo	Exhibit 18	Attachment to TIAA_NYU_00083697: TIAA 2015 Business Planning for NYU	Document is incomplete per FRE 106. The document is part of family of documents attached to an email. The full family has not been included on the list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1551	TIAA_NYU_00084064	TIAA_NYU_00084065	7/29/2009			NYU_TIAA Financing	This document is not relevant. FRE 401-403. It does not relate to the allegations in the case, but rather relates TIAA's debt investments.	The document evidences that TIAA was offering to make investments to finance two NYU student housing facilities near the time of the 2009 RFP. It is probative to the prudence of that RFP and the resulting recordkeeping fees.	
PX1552	TIAA_NYU_00086378	TIAA_NYU_00086379	8/3/2009			RE: Donald Gilles, xxx-xx-0563	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1553	TIAA_NYU_00086385	TIAA_NYU_00086386	8/4/2009			RE: Donald Gilles, xxx-xx-0563	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1554	TIAA_NYU_00088083	TIAA_NYU_00088084	6/15/2012			Email Kehoe (TIAA) to NYU Re: Audit Request - Remedy Log		The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.	
PX1555	TIAA_NYU_00088085	TIAA_NYU_00088085	6/15/2012			Attachment to TIAA_NYU_00088083: NYU Langone Medical Center 2011 call Interactions Report	Document is incomplete per FRE 106. The document is part of family of documents attached to an email. The full family has not been included on the list. Document contains hearsay. FRE 801-802	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1556	Vanguard-NYU_0000175	Vanguard-NYU_0000191	8/1/2017			Vanguard 403(b)(7) Group Custodial Account Agreement			
PX1557	Vanguard-NYU_0001192	Vanguard-NYU_0001196	3/2/2016			Schedule A - NYU Recordkeeping Fee Agreement			
PX1558	Vanguard-NYU_0003980	Vanguard-NYU_0003980	1/30/2017			Email Tocci to Conking Re: State Visit form for NYU			
PX1559	Vanguard-NYU_0003981	Vanguard-NYU_0003981	1/30/2017			Attachment to Vanguard- NYU_0003980: RFP Finalist Meetings Invitees	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1560	Vanguard-NYU_0003982	Vanguard-NYU_0003987	2/1/2017			Attachment to Vanguard-NYU_0003980: Vanguard Meeting Summary	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1561	Vanguard-NYU_0005056	Vanguard-NYU_0005056	11/11/2016			Email from Tocci to Bednar re NYU Pricing Analysis	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1562-3. Document contains hearsay 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1562	Vanguard-NYU_0005057	Vanguard-NYU_0005057	9/30/2016			Attachment to Vanguard-NYU_0005056: NYU RFP Pricing Numbers	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1561; PX1563.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1563	Vanguard-NYU_0005058	Vanguard-NYU_0005059	11/11/2016			Attachment to Vanguard-NYU_0005056: NYU RFP Pricing Numbers	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1561; PX1563.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1564	Vanguard-NYU_0007982	Vanguard_NYU_0007985	4/9/2015	(164-082)	Ex. 073	Attachment to Vanguard-NYU_0007974: Vanguard Client Team Summary - NYU	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1565	Vanguard-NYU_0010393	Vanguard-NYU_0010394	1/6/2017	Vanguard Rep		Attachment to Vanguard-NYU_0010391: NYU RFP - Obstacles; NYU RFP - Vanguard Assets (in our favor)	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Rule does not require it.</p> <p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Rule does not require it.</p>	
PX1566	Vanguard-NYU_0011556	Vanguard-NYU_0011557	10/29/2015			Email Tocci to Bednar Re: NYU Pricing 2015	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1567-8. Document contains hearsay 801-802. Those on the email will not be appearing live at trial.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit. Rule does not require it.</p>	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1567	Vanguard-NYU_0011558	Vanguard-NYU_0011558	10/29/2015			Attachment to Vanguard-NYU_0011556: Pricing Analysis based on asset based reduction	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1566; PX1568.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1568	Vanguard-NYU_0011559	Vanguard-NYU_0011571	10/29/2015			Attachment to Vanguard-NYU_0011556: Delivering Value To Your Plan presentation.	The document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX0914; PX1566.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1569	Vanguard-NYU_0011878	Vanguard-NYU_0011883	10/17/2013	Vanguard Rep		Attachment to Vanguard-NYU_0011876: Meeting Summary	The document is incomplete. FRE 106. The document is part of a family of documents, all of which are not on the exhibit list. Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1570	Vanguard-NYU_0012654	Vanguard-NYU_0012655	10/15/2015			Email from Tocci to Bednar Re: NYU Pricing	This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1570-1. Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1571	Vanguard-NYU_0012656	Vanguard-NYU_0012656	8/31/2015			Attachment to Vanguard-NYU_0012654: NYU 9.15 Pricing Analysis	This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1489; PX1491.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1572	Vanguard-NYU_0012657	Vanguard-NYU_0012657	8/31/2015			Attachment to Vanguard-NYU_0012654: NYU 9.15 Pricing Analysis	This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1570-1. Document contains hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1573	Vanguard-NYU_0016709	Vanguard-NYU_0016712	12/16/2015			Attachment to Vanguard-NYU_0016701: Client Team Summary - NYU	This document is incomplete. FRE 106. The document is part of a family of documents, all of which have not been included on the list. Document contains hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	



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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1574	Vanguard-NYU_0017949	Vanguard-NYU_0017953	11/9/2015		Email Tocci to Schultz Re: NYU Pricing 2015		This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1574-1576. Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1575	Vanguard-NYU_0017954	Vanguard-NYU_0017954	9/30/2015		Attachment to Vanguard-NYU_0017949: NYU 9.15 Pricing Analysis		This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1574; PX1576.	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1576	Vanguard-NYU_0017955	Vanguard-NYU_0017967	11/18/2015		Attachment to Vanguard-NYU_0017949: Delivering value to your plan (NYU 9.15 Pricing Proposal)		Description of document does not match the Bates range listed. This document is incomplete. FRE 106. The document is part of a family of documents, which are listed as separate exhibits. PX1574-5	Plaintiffs have revised the description to address Defendant's objection. Further, the rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX1577	Vanguard-NYU_0021867	Vanguard-NYU_0021873	5/31/2013			Email Bednar to Tocci Re: Revised - NYU lowest shareclass analysis	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1578	Vanguard-NYU_0021921	Vanguard-NYU_0021922	10/10/2013			Email Tocci to Bednar Re: For 4pm / Scott prep form / NYU		The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1579	Vanguard-NYU_0021923	Vanguard-NYU_0021928	10/17/2013			Attachment to Vanguard-NYU_0021921: Client Turnover Summary	Document is incomplet. The document is part of a family of documents, all of which have not been included on this list. Document contains hearsay. FRE 801-802	The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1580	Vanguard-NYU_0022118	Vanguard-NYU_00221120	6/6/2016	Vanguard Rep		Tocci email to Rezler regarding [External] NYU - Fund change decision	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	

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PX1581	Vanguard-NYU_0022668	Vanguard-NYU_0022672	6/6/2016	Vanguard Rep		Email Tocci to Bednar Re: NYU update	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1582	Vanguard-NYU_0022772	Vanguard-NYU_0022775	3/2/2016	Vanguard Rep		Email Tocci to Bednar Re: Mark Petti Call	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1583	Vanguard-NYU_0025350	Vanguard-NYUJ025489	11/16/2012			NYU Vanguard Investment Changes			
PX1584	Vanguard-NYU_0027071	Vanguard-NYU_0027073	3/3/2011			Attachment to Vanguard- NYU_0027070: Client Turnover Summary	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list, including the cover email. Document contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	

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PX1585	Vanguard-NYU_0027121	Vanguard-NYU_0027121	8/11/2011			NYU Scenarios	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1586	Vanguard-NYU_0027484	Vanguard-NYU_0027489	10/18/2011	Vanguard Rep		Email Tocci to Vardaro Re: NYU Commtee Mtg - 11/14	Document contains Hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1587	Vanguard-NYU_0029017	Vanguard-NYU_0029019	5/22/2013	Vanguard Rep		Email Tocci to Bednar Re: NYU lowest shareclass analysis	Documents is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1588	Vanguard-NYU_0029020	Vanguard-NYU_0029021	4/30/2013			Attachment to Vanguard-NYU_0029017: Vanguard NYU - 2013 Lowest SC Prior Month Asset 0.03 RK Credit			
PX1589	Vanguard-NYU_0029022	Vanguard-NYU_0029023	4/30/2013			Attachment to Vanguard-NYU_0029017: Vanguard NYU - 2013 Lowest SC Prior Month Asset 0.09 RK Credit			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1590	Vanguard-NYU_0029040	Vanguard-NYU_0029045	5/31/2013			Email Tocci to Bednar Re: NYU lowest shareclass analysis (Attachment: NYU Lowest SC with updated 45 per part fee)	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1590-91. Document contains hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1591	Vanguard-NYU_0029046	Vanguard-NYU_0029047	4/30/2013			Attachment to Vanguard- NYU_0029040: Vanguard NYU- 2013 Lowest SC Prior Month Assets 2012 0.09 RK Credit	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1590; PX1592.	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1592	Vanguard-NYU_0029048	Vanguard-NYU_0029049	4/30/2013			Attachment to Vanguard-NYU_0029040: Vanguard NYU-2013 Lowest SC Prior Month Assets 2012 0.03 RK Credit	Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1590-91. Document contains hearsay.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1593	Vanguard-NYU_0029832	Vanguard-NYU_0029832	10/8/2012	Vanguard Rep		Email Bednar to Tocci Re: Client risk assessment	Document contains Hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	
PX1594	Vanguard-NYU_0031467	Vanguard-NYU_0031467	2/27/2017			Email Tocci to Bednar Re: Client Strategies			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1595	Vanguard-NYU_0031468	Vanguard-NYU_0031468	2/27/2015			Attachment to Vanguard-NYU_0031467: Client Turnover Summary	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1596	Vanguard-NYU_0032855	Vanguard-NYU_0032861	4/16/2015			Vanguard NYU Client Team Summary	Document contains Hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	
PX1597	Vanguard-NYU_0033177	Vanguard-NYU_0033183	12/31/2015			Client Turnover Summary	Document contains Hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	

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PX1598	Vanguard-NYU_0033185	Vanguard-NYU_0033190	2/1/2017			Vanguard NYU Meeting Summary	Document contains Hearsay. FRE 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	
PX1599	Vanguard-NYU_0036323	Vanguard-NYU_0036325	6/4/2013			Email Tocci to Bednar Re: Binder for NYU Submitted on 6/4/2013 For Your Approval	<p>Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1600.</p> <p>Document contains hearsay. FRE 801-802.</p>	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1600	Vanguard-NYU_0036326	Vanguard-NYU_0036327	4/30/2013			Attachment to Vanguard-NYU_0036323: Vanguard NYU-2013 Lowest SC Prior Month Assets 2012	<p>Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX1599.</p>	<p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	



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PX1601	Vanguard-NYU_0038746	Vanguard-NYU_0038752	10/17/2013			Attachment to Vanguard-NYU_0038744: Client Turnover Summary	Document is incomplete. FRE 106. Document is part of a family of documents, all of which have not been included on this list. Document contains hearsay 801-802.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1602	Vanguard-NYU_0046838	Vanguard-NYU_0046839	8/10/2011			Email Tocci to Bednar Re: NYU Shareclass Flexibility	Document contains Hearsay. FRE 801-802. Document is incomplete. FRE 106. Document is part of a family of documents, which are listed as separate exhibits. PX0921.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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PX1603	Vanguard-NYU_0053891	Vanguard-NYU_0053906	5/5/2009			Attachment to Vanguard-NYU_0053890: Client Council Briefing Forms Univ of Penn	Document is incomplete. FRE 106. Document is part of a family of documents, all of which are not included on this list. Document contains hearsay. FRE 801-802. Document is not relevant. FRE 401-403. Document contains information relating to Vangaurd's other clients, not involved in this case.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1604	Vanguard-NYU_0068246	Vanguard-NYU_0068246	11/15/2010			Attachment to Vanguard-NYU_0068245: Client Scorecard (DC Plans Only)	Document is incomplete. FRE 106. Document is part of a family of documents, all of which are not included on this list. Document contains hearsay. FRE 801-802. Document is not relevant. FRE 401-403. Document contains information relating to Vangaurd's other clients, not involved in this case.	<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	

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PX1605	Vanguard-NYU_0069249	Vanguard-NYU_0069250	11/6/2009		Email Bednar to Pelsko Re: Fw: [Fwd: Travel expenses]	Document contains hearsay. 801-802. Document is part of a family of documents, which are listed as separate exhibits on the list. PX0925-6		<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p> <p>The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.</p>	
PX1606	Vanguard-NYU_0069256	Vanguard-NYU_0069257	11/6/2009		Re: NYU RFP Update	Document contains hearsay. FRE 801-802		<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	
PX1607	Vanguard-NYU_0069331	Vanguard-NYU_0069334	1/19/2010		Re: Presentation Request Form Confirmation for NYU	Document contains hearsay. FRE 801-802		<p>The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.</p>	

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PX1608	Vanguard-NYU_0078906	Vanguard-NYU_0078909	10/18/2011			NYU Committee Mtg Letter 11/14	Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1609	Vanguard-NYU_0079049	Vanguard-NYU_0079052	4/21/2014			Email from Tocci to Yolanda re NYP Plans - 500 Index and Total Stock Shareclass Change	Document contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1610	Vanguard-NYU_0079176	Vanguard-NYU_0079179	4/30/2013			Vanguard NYU-2013 Lowest SC Prior Month Assets 2012	Document contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1611	Vanguard-NYU_0079184	Vanguard-NYU_0079187	4/30/2013			Vanguard NYU-2013 Lowest SC Prior Month Assets 2012	Document contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1612	Vanguard-NYU_0079718	Vanguard-NYU_0079723	2/9/2010			Client Turnover Summary	Document contains hearsay. FRE 801-802	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1613	Vanguard-NYU_0080226	Vanguard-NYU_0080229	12/31/2014			Client Turnover Summary	Document contains hearsay. FRE 801-802.	The parties have stipulated that this document is authentic under FRE 901 and a business record under FRE 803(6) in the Stipulation Regarding Authenticity of Documents. Defendant has not identified what portions of the business record constitute hearsay within hearsay. To the extent the document contains hearsay within hearsay it is offered to show knowledge on the part of Defendant or its agents regarding underlying document and not for the truth of the matter asserted. See FRE 801. Additionally, to the extent Defendant alleges that Defendant's or Defendant's Agent's statements are hearsay, they are admissions by a party opponent or agent under Rule 801 and excluded from the definition of hearsay.	
PX1614	Vanguard-NYU_0046662	Vanguard-NYU_0046703				Email Roman to Rotenberger Re: FW: NYU Books Attachment to CLC0065850: NYU Retirement Plan			
PX1615	CLC0065853	CLC0065854	4/1/2018						
PX1616			7/8/1905	Nancy Sanchez Depo / Linda Woodruff Depo	Exhibit 1 / Exhibit 12	Vanguard Share Class Sheet	Authenticity FRE 901. Cumulative; document appears to be the same as PX1547.	Plaintiffs will establish the authenticity of his document with witnesses at trial. Duplicative exhibits have been deleted. What remains are unique exhibits and those retained to respond to Defendant's objections regarding completeness.	
PX1617	TIAA_NYU_00059885	TIAA_NYU_00060000				CREF Annual Report 2009.pdf	Authenticity FRE 901. Plaintiffs have not provided enough information for Def to identify and locate this document.		
PX1618			12/31/2010	Daniel Fischel Depo		CREF 2010 Annual Report	Authenticity FRE 901. Irrelevant. FRE 401-403. Pls. have not provided Def. with enough information to determine what this document is. Defendant reserves its right to further object to this document.	Plaintiffs will establish the authenticity of his document with witnesses at trial.	
PX1619	CLC0065939	CLC0065939	1/1/2018			Attachment to CLC0065850: NYU STDA Plan First Amendment			
PX1620				(164-046)		Minutes of the faculty senators council meeting (11/3/2016 - 11/2/2017)	Plaintiffs have grouped a number of meetings together and has not delineated exactly which meetings to which they are referring. Accordingly, Defendant reserve its right to further object to this exhibit.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1621			11/2/2017	(164-047)		Presetation for the faculty senators council meeting 11/2/2017 -- Student Success MJ Knoll-Finn, Vice President for Enrollment Management	Authenticity FRE 901. This document contains hearsay. FRE 801-802. The document is not relevant. FRE401-403. It relates to student retention.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801.	
PX1622			11/2/2017	(164-048)		Presetation for the faculty senators council meeting 11/2/2017 -- Trends Student Success (NYU)	Authenticity FRE 901. This document contains hearsay. FRE 801-802. The document is not relevant. FRE401-403. It relates to student retention.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801.	
PX1623			11/2/2017	(164-049)		Presetation for the faculty senators council meeting 11/2/2017 -- Current Structure Student Success Critical Partners	Authenticity FRE 901. This document contains hearsay. FRE 801-802. The document is not relevant. FRE401-403. It relates to student retention.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801.	
PX1624			12/14/2017	(164-050)		Minutes of the faculty senators council meeting 12/14/2017	Authenticity FRE 901. This document contains hearsay. FRE 801-802. The document is not relevant. FRE401-403.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801.	
PX1625			10/21/2017	(164-057)		The Finger-Pointing at the Finance Firm TIAA - The New York Times	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702. The subject of this document is covered in Defendant's motions in limine. This document is not relevant FRE 401-402. The document discusses allegations relating to a whistleblower complaint against TIAA.	Defendant argues TIAA's recordkeeping fees were justified by the "education" services it provides participants. The document is probative that TIAA uses its "education" services to cross sell products. Additionally, DOL regulations require fiduciaries to consider all benefits to vendors when evaluating fees. Cross-selling of products is a benefit to TIAA not considered by NYU. The document is a learned treatise and admissible under FRE 803(18). Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1626			11/9/2017	(164-058)		TIAA Receives New York Subpoena on Sales Practices - The New York Times	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702. The subject of this document is covered in Defendant's motions in limine. This document is not relevant FRE 401-402. The document discusses allegations relating TIAA being subpoenaed unrelated to this case or the allegations in this case.	Defendant argues TIAA's recordkeeping fees were justified by the "education" services it provides participants. The document is probative that TIAA uses its "education" services to cross sell products. Additionally, DOL regulations require fiduciaries to consider all benefits to vendors when evaluating fees. Cross-selling of products is a benefit to TIAA not considered by NYU. The document is a learned treatise and admissible under FRE 803(18). Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1627			7/12/2018	(164-032)		Aon Hewitt InBrief Global Investment Management -- Overall Annuity Rating Comments	Plaintiffs have not provided enough information for Defendant to identify this document. Defendant reserves it right to further object to this exhibit.	The document is a learned treatise and admissible under FRE 803(18); Exhibit is Docket number 164-032.	
PX1628			11/11/2018	(164-039)		Advisory Council on Employee Welfare and Pension Benefit Plans, Report to the Honorable Hilda L. Solis, United States Secretary of Labor, Current Challenges and Best Practices for ERISA Compliance for 403(bh) Plan Sponsors	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 802.	NYU argues that its delay in consolidating recordkeepers was to follow its Principles of Joint Shared Governance. The meetings demonstrate that NYU never presented recordkeeping consolidation to the Faculty Senate as required by those principles. Plaintiffs will establish the authenticity of his document with witnesses at trial. Defendant has not identified what statements within the document constitute hearsay. To the extent they are referencing statements by members of NYU's Faculty, those statements are admissions by an agent of NYU and not hearsay under Rule 801. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1629 PX1630 PX1631 PX1632 PX1633						Intentionally Left Blank Intentionally Left Blank Intentionally Left Blank Intentionally Left Blank Intentionally Left Blank			
PX1634				(164-059)		If You Bought in to TIAA Based on Reputation, Check Your Accounts	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702. The subject of this document is covered in Defendant's motions in limine. This document is not relevant FRE 401-402. The document discusses allegations relating to a whistleblower complaint against TIAA.	Defendant argues TIAA's recordkeeping fees were justified by the "education" services it provides participants. The document is probative that TIAA uses its "education" services to cross sell products. Additionally, DOL regulations require fiduciaries to consider all benefits to vendors when evaluating fees. Cross-selling of products is a benefit to TIAA not considered by NYU. The document is a learned treatise and admissible under FRE 803(18). Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1635				(164-060)		Budget Deal to Cost TIAA-CREF Its Tax Exemption	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702. This document is not relevant as it pertains to TIAA's tax exempt status.	The document is a learned treatise and admissible under FRE 803(18). Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1636				(164-105)		Legacy Investments in Higher Education: What is a Plan Sponsor's Responsibility to Participants?	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702.	Plaintiffs will establish the authenticity of his document with witnesses at trial. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1637	PLA-NYU-004882	PLA-NYU-004901	7/30/2009	(164-112)		Reengineering II More Opportunities for Self Service	Authenticity FRE 901.	The document is a learned treatise and admissible under FRE 803(18)	
PX1638				(164-115)		Viewpoints -- Higher Education's Response to a New Defined Contribution Environment	Authenticity FRE 901. This document contains hearsay. FRE 801-802. Improper expert testimony. FRE 702.	Plaintiffs will establish the authenticity of his document with witnesses at trial. Plaintiffs do not understand Defendant's objection regarding improper expert testimony.	
PX1639				(164-138)		Where TIAA's Profits Go	Authenticity FRE 901.		

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1640	CLC0021706	CLC0021706	6/11/2009			Email - NYU Polytechnic	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1641	CLC0021707	CLC0021795	1/1/2002			Attachment to CLC0021706: 403b Plan Document A	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1642	CLC0021796	CLC0021814	1/1/2003			Attachment to CLC0021706: Amentment One to the Polytechnic University DC Plan	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1643	CLC0021815	CLC0021837	1/1/2003			Attachment to CLC0021706: 403b plan Resolutions	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1644	CLC0021838	CLC0021853	3/17/2009			Attachment to CLC0021706: Retirement Recordkeeping Agreement	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1645	CLC0021854	CLC0021854	3/17/2009			Attachment to CLC0021706: AIG VALic Participant Account Summary	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans.	
PX1646	CLC0021855	CLC0021855	3/17/2009			Attachment to CLC0021706: Retirement Polytedhnic of NYU Summary Accumulations	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1647	CLC0021856	CLC0021875	10/31/2009			Attachment to CLC0021706: Polytechnic_Institute_of_NYU_S PD_102012[2]-1	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1648	CLC0021876	CLC0021876	6/11/2009			Attachment to CLC0021706: Untitled document attachment	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "Poly" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans	
PX1649	CLC0021879	CLC0021879	6/19/2009			Email - Poly	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan. incomplete document per FRE 106. The exhibit lists its attachments as a separate exhibit. PX1649.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans.  The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion.'" United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	



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PX1650	CLC0021880	CLC0021880	6/19/2009			Attachment to CLC0021879: Untitled document attachment	Not relevant. FRE 401, 402, and 403. Document does not relate to the Plans at issue, but rather relates to the NYU Polytechnic Plan.	While the subject of the email is "NYU Polytechnic" it discusses conducting a joint investment review and RFP with the Plans. Therefore it is probative to the investment review and RFP for the Plans. The rule of completeness does not require the inclusion of all attachments to an email. It only requires attachments "if necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." United States v. Johnson, 507 F.3d 793, 796 (2d Cir. 2007)(quoting United States v. Castro, 813 F.2d 571, 575-76 (2d Cir. 1987)). "The completeness doctrine does not, however, require admission of portions of a statement that are neither explanatory of nor relevant to the admitted passages." Jackson, 180 F.3d at 73 (quoting United States v. Jackson, 180 F.3d 55, 73 (2d Cir. 1999)); United States v. Lange, 834 F.3d 58, 79 (2d Cir. 2016). Defendant has offered no reason why the attachments are necessary to explain the proffered exhibit.	
PX1651	CLC0065940	CLC0065941	1/1/2018			Attachment to CLC0065850: NYU Faculty Plan Document Third Amendment			
PX1651	TIAA_NYU_00060590	TIAA_NYU_00060780				REA prospectus 5-10+.pdf			
PX1652	NYU0039313	NYU0039314	12/11/2014			Email Wrightson to Committee Re: NYU/NYU Langone Retirement Committee Meeting - December 11, 2014			
PX1653	Vanguard-NYU_0007974	Vanguard-NYU_0007974	4/9/2015			Email Tymon to O'Neill Re: Invitation: Conversations on Clients			
PX1654	Vanguard-NYU_0007975	Vanguard-NYU_0007977	4/9/2015			Attachment to Vanguard- NYU_0007974: Vanguard Client Team Summary - Airgas, Inc.			
PX1655	Vanguard-NYU_0007978	Vanguard_NYU_0007984	4/9/2015			Attachment to Vanguard- NYU_0007974: Vanguard Client Team Summary - Clarcor, Inc.			
PX1656	Vanguard-NYU_0010391	Vanguard-NYU_0010392	1/6/2017			Email Tocci to Conking and Bednar Re: Additional NYU reference material for RFP			
PX1657	Vanguard-NYU_0010395	Vanguard-NYU_0010399	1/6/2017			Attachment to Vanguard- NYU_0010391: Follow-up questions from RFP participants			
PX1658	Vanguard-NYU_0011876	Vanguard-NYU_0011877	11/5/2013			Email Tocci to Bednar Re: Fw: Consultant meetings scheduled for Wednesday, November 6th			
PX1659	Vanguard-NYU_0016701	Vanguard-NYU_0016704	12/16/2015			Email Tocci to Helfrich Re: PDF conversion to Word			
PX1660	Vanguard-NYU_0016705	Vanguard-NYU_0016708	12/16/2015			Attachment to Vanguard- NYU_0016701: Client Team Summary - Columbia University			
PX1661	Vanguard-NYU_0027070	Vanguard-NYU_0027070	2/1/2013			Email Roman to Plummer Re: NYU Internal Transition Meeting			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1662	Vanguard-NYU_0038744	Vanguard-NYU_0038745	11/5/2013			Email Tocci to Bednar Re: Consultant meetings scheduled for Wednesday, November 6th			
PX1663	Vanguard-NYU_0053890	Vanguard-NYU_0053890	9/8/2009			Email Bednar to Bealla Re: Client Council profile updates			
PX1664	Vanguard-NYU_0068245	Vanguard-NYU_0068245	11/19/2010			Email Brown to Roman Re: Client Relationship Scorecard			
PX1665	NYU0165006	NYU0165012	12/31/2017			NYU SoM Service Provider Summary			
PX1666	NYU0164806	NYU0164808	12/31/2017			NYU Service Provider Summary			
PX1667	CLC0066684	CLC0066692	8/17/2017			RE: NYU - Updated legal documents and Statement of Work.msg			
PX1668	NYU0000619	NYU0000621	11/8/2013			11.8.2013 Custodial Account Agreement with TIAA- Revised Appendix A.pdf			
PX1669	NYU0000613	NYU0000615	4/4/2014			2014 -04-04 Custodial Account Agreement with TIAA- Revised Appendix A.pdf			
PX1670	NYU0000622	NYU0000622	10/17/2014			10.17.2014 Addendum to Appendix A for Custodial Account Agreement with TIAA.pdf			
PX1671	NYU0000360	NYU0000360	9/26/2011			D. Addendum to Appendix A to TIAA Custodial Agreement (Add TIAA-CREF 2055 Lifecycle Fund).pdf			
PX1672	NYU0000273	NYU0000273	4/20/2012			E. Appendix A to TIAA Custodial Agreement (Effective 04-20- 2102).pdf			
PX1673	NYU0163962	NYU0163987	3/31/2017			NYU Plan and Investment Notice; Summary of Plan Services and Costs; Investment Options Comparative Chart			
PX1674	TIAA_NYU_00041774	TIAA_NYU_00041794	6/30/2017			NYUSOM Plan and Investment Notice; Summary of Plan Services and Costs; Investment Options Comparative Chart			
PX1675	NYU0165001	NYU0165001	12/31/2017			Direct Fees - NYU SOM			
PX1676	CLC0009313	CLC0009558	6/30/2010			Cammack Due Diligence report			
PX1677	CLC0044583	CLC0044584	3/2/2015			E-mail from M. Petti to J. Rezler re: FW: Retirement Committee - Impact of TIAA-CREF Share Class Change on Excess Revenue for Annuity Accounts			
PX1678	CLC0044585	CLC0044586	3/2/2015			Impact of TIAA-CREF Share Class Change on Excess Revenue. NYU_TIAA-CREF Annuity Impact Analysis 022615.pdf			
PX1679	CLC0044664	CLC044670	3/6/2015			E-mail from M. Petti to J. Rezler re: FW: Retirement Committee - Impact of TIAA-CREF Share Class Change on Excess Revenue for Annuity Accounts			

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Exhibit No. (i.e. PX1)	Beginning Bates	End Bates	Date	Pleading / Depo	Exhibit / Doc	Description	Basis for Objection	Offering Party Response	Court Ruling
PX1680	CLC044671	CLC0044672	3/6/2015			Summary of the impact of the TIAA-CREF Share Class Change on Excess Revenue for Annuity Accounts. NYU_CREF Share Class Change_2015.docx			